



Section1: Chief Executive's Summary, Response and Recommendation on Submissions Received from Prescribed Bodies

DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Submission No.	LCDP DR817
Submitted by:	Office of the Planning Regulator

Summary of Submission

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put in to the preparation of the draft plan against the backdrop of an evolving national and regional planning policy and regulatory context, and the establishment of the Office.

The submission sets out recommendations and observations under 7 key themes.

1. Core Strategy and Settlement Hierarchy

Recommendation 1:

The planning authority is required to review the proposed Core Strategy, including the population and housing allocations, and to revise as necessary to comply with the requirements of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning and Appendix 1 of the accompanying Circular. The planning authority is required to amend the core strategy and housing demand figures accordingly, as appropriate including the approach to zoning for residential use and for a mixture of residential and other uses, as necessary to accommodate the overall altered housing supply target consistent with the requirements of compact growth. Without prejudice to the approach to be proposed by the planning authority, the application of phasing in accordance with the sequential approach may be appropriate.

Chief Executive's Response:

The Section 28 Guidelines: Housing Supply Target Methodology for Development Planning were published on the 18th December 2020, 5 days before the end of the public consultation period for the Draft Louth County Development Plan 2021-2027 (public display period ended at 12 noon on Wednesday 23rd December 2020). Whilst the contents of recommendation 1 are noted, it is not considered that there is provision in the Planning and Development Act 2000 (as amended) for Section 28 Guidelines published after the date of the publication of the Draft Development Plan to be incorporated into the Draft Development Plan.

The Draft Louth County Development Plan 2021-2027 as agreed by the Elected Members on the 1st October 2020 is consistent, as far as practicable with national and regional policy and any specific planning policy requirements as specified under any section 28 guidelines, as published at the time of the preparation and making of the Draft Development Plan, as required under section 10(1A) of the Planning and Development Act 2000 (as amended). In addition, as required under section 28(1A) of the Planning and Development Act 2000 (as amended), regard was had to any section 28 guidelines available at the time of the preparation and making of the Draft Development Plan.

A more appropriate mechanism to incorporate the requirements of these Section 28 Guidelines into the Development Plan would be to make a variation to the Development Plan after it is adopted, if required.

Chief Executive's Recommendation: No Change

Recommendation 2:

The planning authority is required to revise the Core Strategy concerning the high level of population growth proposed for Ardee and Dunleer, at 33.6% and 51.6%, respectively, to ensure consistency with NPO 9 of the NPF to limit population growth of those two settlements to 2040 to 30% above the 2016 population baseline figure. Having regard to the settlement characteristics of the County, the planning authority should give consideration to reallocating the excess population growth to the Regional Growth Centres of Dundalk and Drogheda. This would be consistent with the objectives of the NPF to support and prioritise the regional roles of these settlements (NPO 2b and NPO 7) and the key priorities under the RSES.

Chief Executive's Response: The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. This asset based assessment included an analysis of a range of criteria including:

- i) Position in the settlement hierarchy
- ii) Employment base
- iii) Connectivity
- iv) Services e.g. schools, community facilities etc.
- v) Infrastructure capacity e.g. roads and water services

Taking account of the high job: workforce ratio in Ardee (0.93) and Dunleer (1.10) in addition to the location, range of services and availability of land, and their designation as Self-Sustaining Growth Towns in the settlement hierarchy, it was considered that both settlements are well positioned to accommodate population and economic growth during the life of the Plan.

Whilst it is acknowledged that the proposed growth rates for Ardee and Dunleer exceeds 30% of the 2016 population, the level of growth must be viewed in the context of the distribution of growth within the County, whereby 7.9% (1,655 persons) of the total projected population growth in the County would take place in Ardee and 4.4% (935 persons) would take place in Dunleer. This level of growth was considered proportionate taking account of their position in the settlement hierarchy and capacity to accommodate growth on a sustainable platform.

Nonetheless, the requirements of NPO 9 are noted and the projected level of population growth in Ardee and Dunleer will be amended so they are less than 30% of the 2016 population for each of the settlements.

Note that this issue was also raised in the EMRA submission item 4, where the same response is provided.

Chief Executive's Recommendation: – Amend the projected population growth for Ardee and Dunleer to 29% of the 2016 population for each settlement.

Settlement	2016 population	29% of 2016 population	Projected Population 2027	% of Total Growth in the County
Ardee	4,928	1,429	6,357	6.8%
Dunleer	1,822	529	2,351	2.5%

The excess population and housing will be redistributed to the Regional Growth Centres of Drogheda and Dundalk. An updated Core Strategy Table (Table 2.15) and the Population Projection and Distribution Table (Table 2.10) setting out the redistribution of population and housing is set out in Appendix 5 of this Report.

2. Compact growth, Regeneration, and Approach to Land Use Zoning

Observation 1:

In order to ensure that the delivery of 30% of all new homes targeted within settlements is provided within their existing built-up footprints, and for consistency with NPO 3 and RPOs 3.2 and 3.3, the planning authority is required to: (i) define in its development plan the areas within the county's settlements that will contribute to this target. In this context, the planning authority should have regard to the definition of brownfield and the range of infill development provided for under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). (ii) Clarify how the guiding principles for brownfield and infill development have been applied in the preparation of the Core Strategy, including in particular the establishment of strategic brownfield and infill sites as part of the Active Land Management process, provision for pilot projects for re-use of brownfield sites and setting of measures to reduce vacancy of units.

Chief Executive's Response: As part of the preparation of the Draft Development Plan a detailed analysis of brownfield and infill sites within the existing built up footprint of settlements was carried out. Whilst the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) does not provide a specific definition for 'brownfield' and 'infill' development the lands identified as infill and brownfield as part of the analysis were in accordance with the principles of such sites as set out in these Guidelines. This analysis focused on the larger sites which have the potential to generate a significant quantum of development. They are primarily located within or close to town and village centres. Additional text could be inserted into section 2.6.6 'Compact Growth' providing further detail on the lands identified in this analysis.

One of the underlying principles of the Draft Plan is the creation of compact, sustainable settlements. This is demonstrated by the inclusion of policy objectives such as CS 2 and HOU 15 which support the principles of compact growth, HOU 16 which supports increased building heights in Drogheda and Dundalk, together with the narrative in the text of the Draft Plan which promotes this pattern of development. In addition there are policy objectives promoting and supporting the rejuvenation of towns and villages (CS4 and HOU 11), investment in lands zoned for regeneration uses (HOU 9), and the sustainable development of vacant residential and regeneration sites (HOU 8).

The inclusion of a new land use zoning category 'Regeneration' also highlights the priority and emphasis that the Draft Plan has placed on consolidation of development in existing urban centres. The sites identified under this category are key sites with significant development potential to deliver a broad range of uses that will assist in creating more

sustainable neighbourhoods and communities and creating an environment that will make these areas more attractive for economic investment.

Examples of such lands include the Westgate Area of Drogheda, for which there is a 'vision' document 'The Westgate Vision' published, and which received funding under the URDF, the former Carroll Village Shopping Centre, and St. Nicholas Quarter in Dundalk. These lands, in addition to the other lands identified for regeneration uses and the other infill and brownfield lands zoned for residential or town centre uses will be actively promoted by the Council for redevelopment.

The Council also acknowledges the challenges in developing some of these lands which can often result in a significant lead in time in the realisation of a particular project. This can be due to a range of issues such as site investigations, contaminated land, access and infrastructure deficits, and the potential higher costs of developing such lands. Taking this into account it is accepted that not all of these lands will be developed during the lifetime of this Plan but nonetheless it remains important in the long term development of the settlements that they are promoted as integral or strategic sites.

In relation to the issue of vacancy it is considered that the policy objectives and associated narrative included in the Draft Plan provides a strong framework for to address this issue. Section 3.5 sets out the policy on the Vacant Site Levy, whilst there are also specific sections in Chapter 3 'Housing' (section 3.7 Town Centre Living) and Chapter 5 'Economy and Employment' (section 5.24 Town Centre First Approach) which emphasises the need for a collaborative and multi-dimensional strategy to addressing the issue of vacancy and under-utilised buildings and land in town centre areas. The need for flexibility in the policy on the re-use and adaptation of vacant and under-utilised buildings is also recognised.

Taking the foregoing into account it is considered that the policy framework both in the Core Strategy and throughout the Plan seeks to support the implementation of the national and regional policy of compact growth and facilitate the regeneration and redevelopment of town and village centres.

Recommendation: No Change

Recommendation 3:

The planning authority is required to determine the projected housing yield on those proposed to be zoned for a mixture of residential and other uses lands, in addition to that of any lands already so zoned.

Chief Executive's Response: The Core Strategy included an analysis of the potential residential yield of lands zoned for mixed use and town centre development. The figures included in Columns J and K of the Core Strategy Table included these figures. Given the uncertainty as to the nature and quantum, and scale of development on such lands, it is difficult to accurately quantify the potential number of units that these lands could deliver. In order to provide further clarity an additional table setting out the potential housing yield of lands zoned for town centre and mixed use development could be included in the Core Strategy.

Chief Executive’s Recommendation: Insert the following additional text and table into section 2.6.6 of the Core Strategy:

2.6.6 Compact Growth

An overriding objective of both the NPF and the RSES is the need to achieve ambitious targets for compact growth in urban areas. Louth is required to deliver at least 30% of all new homes within existing built up footprints (NPO 3c). Achieving this target can be realised through urban regeneration and infill/brownfield site development, which will contribute to sequential, sustainable and compact growth, revitalisation of existing settlements of all scales and transition to a low carbon, climate resilient society.

In satisfying this target for compact growth, an analysis of appropriate brownfield and infill sites with potential capacity to deliver new homes was completed for Dundalk, Drogheda, Ardee and Dunleer and the remaining Level 3 settlements. **This compact growth will be delivered in central locations of these settlements and along key transport corridors on lands zoned for town centre, residential, or mixed uses.**

Details of the potential capacity of infill and brownfield lands are set out in Table 2.15. **Included within the figures of infill and brownfield development are the potential residential capacity of lands zoned for town centre and mixed use development. These are set out in Table 2.14.**

Settlement Category	Settlement	Potential number of units that can be delivered on lands zoned for Town Centre and Mixed Use development
Regional Growth Centre	Drogheda	500
	Dundalk	570
Self-Sustaining Growth Town	Ardee	30
	Dunleer	40

Table 2.14: Potential residential capacity of lands zoned for town centre and mixed use development in the higher tier settlements

Recommendation 4:

The planning authority is required to review the proposed land use zoning proposed under the Core Strategy table 2.14, , or as revised subsequent to the review as per Recommendation 1 above, to ensure that the quantum of new residential lands proposed is fully justified on the basis of and consistent with residential densities recommended in the Sustainable Residential Development in Urban Areas: Cities, Towns and Villages, Guidelines for Planning Authorities (2009), having regard to the housing yield to be achieved on brownfield land and infill sites and on mixed use land use zones.

Chief Executive's Response: Compact growth is development that takes place within and close to the existing built up footprint of settlements and consists of the redevelopment of vacant or under-utilised lands or the development of infill sites. As set out in section 2.6.6 'Compact Growth' of Chapter 2 an analysis of the potential lands available to deliver infill and brownfield development in each settlement was carried out. These figures are set out in Column J of the Core Strategy Table. A calculation of the potential number of units that could be delivered on these lands is set out in Column K of the Core Strategy table.

As required under national and regional policy, this Plan promotes a sequential pattern of development that focuses on the creation of compact, sustainable settlements. It is acknowledged however, that there can be challenges in the development of infill and brownfield lands and dealing with various issues such as contaminated lands, access, and connection to/upgrade of services, which can increase the cost of servicing the lands and result in a longer timeframe in their development. The analysis of infill and brownfield lands identified that there is potential for in excess of 4,000 units to be delivered on infill and brownfield lands, which is approximately 50% of the total household allocation for the County during the plan period. It is acknowledged however that not all of these lands will be developed during the lifetime of this Plan, and it may take a number of development plan cycles for the lands to be developed. In addition some of the lands may be developed for uses other than housing such as commercial or employment generating uses. Taking this into account, it is important that there is sufficient flexibility in the land use zoning strategy to ensure that there are sufficient lands available to meet the housing needs of the County during the life of the Plan.

It is also acknowledged that there are significant lands zoned for residential development in Drogheda and Dundalk, which is in excess of the land requirement to deliver the housing allocation for the settlements as set out in the Core Strategy. However these excess lands must be viewed in the context of the long term development strategy for these settlements. In order to ensure the residential needs of both the existing and projected additional population in these Regional Growth Centres can be met it is critical that there is flexibility in the residential lands available for development. Within both settlements there are significant parcels of undeveloped lands identified for residential use.

It will take a considerable period of time, in some cases multiple development plan cycles for the lands to be built out however it is logical in terms of design, layout, connectivity, and infrastructure provision that the large parcels of residential lands are designed as a single development area. This can be carried out as part of a Master Plan which will also include detailed phasing for the build out of the lands which will allow the release of lands for development to be carefully managed in accordance with the Core Strategy and development plan requirements.

Given the extent of some of the parcels of land identified for residential development it will take a significant period of time to design and prepare a Master Plan, which could mean that it may be a number of years into the Development Plan cycle before a planning application is received on some of the parcels of land. It is for this reason and the desire to ensure that both Regional Growth Centres have the capacity to facilitate the residential requirements to meet the projected population growth without being constrained by lands not being released for development for various reasons that the extent of lands available has been identified for residential development.

In the Northern Environs of Drogheda there is a legacy of historic extant planning permissions for multi-unit developments that have not commenced. It is anticipated that a significant proportion of these permissions will not be implemented; however they will not expire for a number of years. Taking this into account it was considered prudent to retain the residential land use zoning in the Northern Environs of Drogheda and review it in greater detail as part of the Joint LAP. It must also be noted that there are significant infrastructure constraints on the development of these lands i.e. the delivery of the Drogheda PANCR and water services that is inhibiting the development of these lands. This has been identified in the Infrastructure and Land Use Evaluation in Appendix 2 of Volume 3 of the Draft Plan. Taking this into account it is considered that the residential land use zoning in North Drogheda should be retained and reviewed in greater detail as part of the Joint LAP.

This review will include details of the phasing of the development of the lands and will have the benefit of more information on the status of the PANCR and the water services capacity and investment requirements to facilitate development in this part of the town.

It is recognised however that further clarity is needed in the Plan as to how the residential lands will be built out and in this regard the introduction of phasing would provide further clarity on this issue. This will only be a requirement in the Regional Growth Centres of Drogheda (which will be introduced following the preparation of the Joint LAP) and Dundalk, and the Self-Sustaining Growth Towns of Ardee and Dunleer. In all other settlements the build out of residential lands can be appropriately managed through the Development Management process.

Chief Executive's Recommendation: Introduce phasing arrangements for the release of residential lands for development in the Regional Growth Centres of Drogheda, Dundalk, Ardee, and Dunleer.

Insert the following additional text into section **2.6.6 Compact Growth**

In satisfying this target for compact growth, an analysis of appropriate brownfield and infill sites with potential capacity to deliver new homes was completed for Dundalk, Drogheda, Ardee and Dunleer and the remaining Level 3 settlements. **This compact growth will be delivered in central locations of these settlements and along key transport corridors on lands zoned for town centre, residential, or mixed uses.**

The proposed phasing of residential lands is set out in the proposed amendments to the zoning maps which can be viewed in Appendix 6 of this report.

Insert the following policy objective into the Core Strategy:

Policy Objective

CS XX	To apply phasing to the delivery of new residential development as indicated on the zoning maps for the applicable settlements, whereby residential development, other than infill, brownfield or mixed use development will generally only be permitted on Phase 1 lands. Where lands zoned 'New Residential Phase 1' are not being brought forward for development in particular areas and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing during the lifetime of this Plan appropriately located 'New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.
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New Residential (A3) New Residential – Phase 2

Objective

To provide for new residential neighbourhoods and supporting community facilities.

Guidance

These are lands identified for residential uses that will only become available for development after 75% of the Phase 1 (A2) lands in the immediate vicinity of the phase 2 lands have been developed (as set out in policy objective CS *). The Planning Authority will monitor the lands zoned 'New Residential Phase 1' at regular intervals. If it becomes apparent that there are lands zoned 'New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

Observation 2:

It is advised that the provisions of the draft plan are revisited to ensure; (i) Full consistency with the section 28 guidelines for planning authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages, Guidelines for Planning Authorities (2009) in terms of residential densities; (ii) A flexible approach is included to provide a range of suitable residential accommodations to facilitate housing demand from the projected growth in the elderly population.

Chief Executive's Response: Table 13.3 of the Draft Plan is titled 'Recommended Density and Maximum Plot Ratio'. This table does not refer to a maximum density however it is acknowledged that the 'maximum plot ratio' may imply a 'maximum or ceiling' on the quantum of development on a particular site.

Section 3.11 ‘Densities’ in Chapter 3 ‘Housing’ sets out in more detail than chapter 13, the strategy on densities. This includes Table 3.2, which outlines the recommended minimum density per settlement for higher tier settlements.

To clarify this issue it is recommended that Table 13.3 is amended so it aligns with Table 3.2.

Chief Executive’s Recommendation: Amend Table 13.3 so it is consistent with Table 3.2

Table 13.3: Recommended density and ~~Maximum~~ Plot Ratio

Settlement Category	Recommended Minimum Density per Hectare		Maximum Plot Ratio	
	Town/Village Centre	Edge of settlement	Town/Village Centre	Edge of settlement
Regional Growth Centres	50	35	2	1
Dundalk and Drogheda				
Self-Sustaining Growth Town	35	25	1	0.5

Recommendation 5:

It is recommended that the residential land use zoning in the draft plan be amended, to more demonstrably comply with the sequential approach and with the national objective for compact growth, as follows: (i) The provisions for land use zoning to accommodate new residential development in Dundalk should be refocused onto lands which are most proximate to Dundalk town centre and its railway station, as opposed to less favourably located lands in Blackrock to the south; (ii) The proposed isolated residential land use zoning objective subject of a spot objective SO3 should be removed, inclusive of the spot objective; (i) The proposed residential land use zone to the southeast of Dunleer should be removed. The provision of an alternative, sequentially favourable site should only be considered for inclusion where necessary under the Core Strategy, as revised in accordance with other recommendations and observations in this submission.

Chief Executive’s Response: In line with national and regional policy the Draft Plan is prioritising the Regional Growth Centres of Drogheda and Dundalk for population, residential and employment growth. The RSES projects that by 2031 the population of Drogheda and Dundalk will be 50,000 persons. In order to support and facilitate the growth of these settlements and enable them to fulfil their potential as Regional Growth Centres, it is important that there are sufficient lands available to meet their residential, economic, and employment needs.

With regard to the future pattern of development in Dundalk the Draft Plan places a strong emphasis on consolidation of the urban core in the area around Dundalk Town Centre through the identification of regeneration areas that will act as a stimulus for further redevelopment in the town centre area. There is also an emphasis placed on improving the vibrancy of the town centre, part of which can be created by bringing people back to the town centre and facilitating town centre living.

In addition to supporting town centre redevelopment additional lands are required to meet the residential needs of both the existing and projected population in the Regional Growth Centre. In identifying residential lands within Dundalk consideration must be given to the fact that there is a legacy of excess residential lands in the town.

This presented a significant challenge in developing the growth strategy for the town and ultimately resulted in a significant quantum of residential lands being placed in a strategic reserve. It was considered that this would assist in focusing development in the residential lands that were retained.

The Mount Avenue area of Dundalk has been identified as a location that can deliver a significant quantum of residential development in proximity to the town centre area. In the Blackrock area of Dundalk there is a significant level of residential activity ongoing in residential developments that are under construction. In addition An Bord Pleanála has granted permission for 3no. Strategic Housing Developments in the area for a total of in excess of 800 residential units (ABP-301910-18 158 units, ABP-304782-19 403 units, and ABP-308135-19 257 units). These recent decisions were reflected in the land use zonings in the Blackrock area.

As part of the response to recommendation 4 of this submission a review of the quantum of residential lands required in Dundalk was carried out. This has resulted in the introduction of phasing for the residential lands. In the Blackrock area this has resulted in all lands zoned 'New Residential' lands other than those with an extant permission being placed in phase 2. With regards to the lands south and west of Dundalk town centre that are in a Strategic Reserve (i.e. lands south of Mount Avenue and north of the IDA Science and Technology Park) it is acknowledged that they have the potential to support the creation of a compact settlement in proximity to the town centre. The development of these lands will form part of the medium-long term growth strategy for the town. As part of the preparation of the Local Area Plan for Dundalk the residential lands identified will be re-examined. This may result in amendments to the zonings in this area of the town, particularly if it is apparent there are residential lands not being brought forward for development.

It is considered that the proposed phasing of the residential lands in Dundalk has addressed the concerns raised in the submission. This phasing strategy will assist in managing the future growth and development of the town that will create a compact and sustainable pattern of development whilst also enabling the town to economic investment and strengthen its role as a regional driver for growth in the border area.

Spot Objective 3 Dundalk

The lands subject to Spot Objective 3 in Dundalk have been identified to facilitate the provision of a retirement village. It is acknowledged that these lands are isolated and are a considerable distance from any supporting services or facilities. The residential zoning of these lands will be removed and the land use zoning changed to 'Tourism and Leisure' to reflect the zoning of the adjacent lands.

Dunleer

Whilst the subject lands are on the edge of the settlement consideration must be given to the fact that they are opposite a school and an existing employment facility. In this regard it is considered that the development of these lands would support sustainable travel patterns consistent with national and regional policy. As part of the response to recommendation 1 in the Core Strategy a review of the quantum of residential lands required in Dunleer was carried out.

This has resulted in the introduction of phasing for the residential lands in Dunleer, with part of the subject lands being placed in 'Phase 2'.

Chief Executive's Recommendation:

Introduce phasing of residential lands in Dundalk. See the proposed phasing arrangements on the proposed amended zoning map for Dundalk which can be viewed in Appendix 6 of this report.

Change the land use zoning of the lands subject to Spot Objective 3 in Dundalk from A2 'New Residential' to I1 'Tourism and Leisure' and remove the Spot Objective.

Introduce phasing for the residential lands in Dunleer. See the proposed phasing arrangements on the proposed amended zoning map for Dunleer which can be viewed in Appendix 6 of this report.

Recommendation 6:

The planning authority is required to review its Infrastructure Assessment and Land Use Evaluation (IALUE) and its proposed land use zonings in order to accord with the requirements of NPO 72a (and Appendix 3), NPO 72b and NPO 72c of the NPF, concerning the Tiered Approach to Zoning. (a) The IALUE is required to: (i) provide for a clear, evidence-based conclusion on lands which are determined to be tier 1 and land which are determined to be tier 2; (ii) assess all lands which are being considered for land use zoning for new development under the plan, not just residential, including for Drogheda; and (iii) include a reasonable estimate of the full cost of delivery of the specified services for each site identified as tier 2 land. (b) The proposed land use zonings are required to be amended to align with the conclusions of the IALUE and to exclude any lands which cannot feasibly be serviced within the plan period in accordance with NPO 72c.

Chief Executive's Response:

It is considered that the Infrastructure Assessment and Land Use Evaluation provides a strong platform for decision making on land use zoning in the Draft Plan. Given that the requirement to carry out this assessment is a new concept with limited guidance on the scope of detail required to be included, the assessment was based on what the Forward Planning Department, in consultation with the Infrastructure and Water Services Departments in the Council and Irish Water, considered was the most logical and coherent way of carrying out the assessment and presenting the information, taking account of the extent of work involved, the resources available, and the timeframe to carry out the assessment.

In identifying the individual sites for assessment it was considered that the optimal method would be to prioritise the sites based on location and zoning, with the emphasis primarily on residential and employment zonings.

It is acknowledged that a case could be made for making the parcel of land in each of the sites identified smaller, particularly in the larger development centres, however it was considered that an analysis of a larger extent of lands would provide greater clarity on the infrastructure required to serve an entire block of lands in a given area.

When carrying out this analysis it was accepted that queries may arise on the designation of specific sites as tier 1 or tier 2, particularly in cases where there is an extensive list of infrastructure requirements to facilitate the development of the lands. In such cases consideration was given to the fact that parts of the sites identified may be able to be developed without requiring all of the infrastructure identified in the assessment to be in place. This could include for example part of a link road or footpath/cycle way or partial upgrades to the water services network. Where this was the case, the entire site was identified as Tier 2 i.e. the lands would be serviceable during the lifetime of the Plan. Whilst it is acknowledged that this approach could potentially include the zoning of excess lands it was considered that there are sufficient checks and balances in the Development Management system alongside a strong policy platform and associated policy objectives in the Development Plan that would ensure the implementation of the Development Plan would be in accordance with national and regional policy.

When formulating this approach consideration was also given to the feedback from Irish Water and the way the utility provider deals with proposals where there are constraints with infrastructure i.e. if a developer can provide an acceptable solution to address any constraints or deficits in infrastructure not included in an Investment Plan, it would consider such proposals. Taking this into account it was decided that the most appropriate option where such cases arise would be to include the sites in Tier 2.

However, in light of the recommendations of the OPR it is considered that the availability of lands for development should be more closely linked to the availability of infrastructure. In this regard it is proposed to introduce phasing for the release of residential lands. For example an entire site may be identified as Tier 2 in the IALUE however only part of the lands will be available for development, taking account of the infrastructure investment required in the particular location.

In order to provide further clarity on how the decision was arrived at as to whether a site was identified as Tier 1 or Tier 2 additional supporting text will be included in the narrative of the report.

The submission also requested all lands being considered for new development are assessed under the evaluation and not just the residential lands. Taking this into account, 34 additional sites have been identified for assessment. These sites are located in the higher tier settlements of Drogheda, Dundalk, Ardee, and Dunleer.

These sites consist of lands zoned for residential, employment, regeneration, transportation, tourism uses in addition to lands located within a strategic reserve.

Whilst it is noted that NPO 72b requires a 'reasonable estimate' of the full costs of the specified services to be included in the assessment and the OPR has requested this information to be included, the Council would have a number of concerns in providing such information. Firstly, in the absence of detailed guidance on the methodology for carrying out the assessment, there is no definition of what a 'reasonable estimate' of the costs is.

For the larger projects there are a number of steps from design concept to preliminary design, preferred options, then detailed design before an actual 'reasonable estimate' of delivering the project can be identified. Given that the majority of projects are not at this detailed design stage the Council is not in a position to provide a set of costs that it would consider to be reasonable. In addition other issues such as inflation and potential increases in construction costs also have to be considered, particularly for larger projects which may not commence for a number of years or extend into the next development plan. No guidance has been given as to how this should be factored into the 'reasonable estimate'.

Irish Water were also consulted with regard to providing costs. The utility provider indicated that they are not in a position to provide these costs and have previously indicated this to the Department and the OPR. Taking the foregoing into account an estimate of the costs of the delivery of the infrastructure will not be included in the assessment as the Council is not in a position to provide a 'reasonable estimate' given the number of uncertain variables in this information.

The submission also requested that any lands which cannot feasibly be serviced within the plan period in accordance with NPO 72c should be excluded. In this regard it is noted that the following lands have been made available for development however issues with services have been identified:

Dundalk – Site 3 – Lands identified for General Employment uses – whilst water and waste water issues have been identified on these lands consideration was given to the location of the lands in a well connected area of the town suitable for employment related development. In addition, depending on the nature of any uses associated with the development of the lands, the demand for water and waste water discharges may vary. Taking this into account, in addition to the fact that the Drainage Area Plan for Dundalk may identify potential solutions to the water services issues in the area, it is recommended that this employment zoning is retained. This can be re-examined as part of the preparation of the Local Area Plan.

Collon – Sites 5, 6, and 7 - Lands identified for General Employment uses – These lands are unserved and are removed from the central core of Collon. They have been identified over a number of development plans, with the rationale set out in a research paper 'Locating industry in Louth (2002)' which aimed to provide a more even distribution of employment opportunities throughout the County, particularly to the west where it was considered that less opportunities were available. Collon was identified as the most suitable settlement due to its strategic location between Dundalk and Drogheda and its proximity to the M1. Three parcels of lands were subsequently identified and zoned accordingly.

The site to the west of Collon partly adjoins Collon Business Park. The retention of this zoning would support the clustering of employment related uses in this location and would be acceptable.

The lands to the south of Collon are partially developed and therefore it is appropriate that this zoning is retained.

The lands to the east of the N2 are located on rising land along a narrow Class 2 Road. The Infrastructure Assessment identified the road would need to be widened and upgraded with a junction upgrade to the N2 also required. Taking this into account, in addition to the fact that the lands are unserviced, it is considered that the General Employment Zoning on these lands should be removed.

Chief Executive's Recommendation

- Provide additional narrative in the IALUE setting out how the lands were identified as Tier 1 or Tier 2
- Expand the number of sites to be assessed in the higher tier settlements of Drogheda, Dundalk, Ardee, and Dunleer. The assessment of these additional sites can be viewed in Appendix 8 of this Report.
- Insert the following additional text into section 1.1.5 of the Infrastructure Assessment and Land Use Evaluation (IALUE) (additional text in red and deleted text in blue)
- Remove the 'General Employment' zoning for Site 5 in Collon and update the zoning map accordingly. See the proposed amended zoning map in Appendix 6 of this Report.

1.1.5 Tier 1 and Tier 2 Lands

In order for a parcel of land to be identified as 'Tier 1' there shall be no infrastructure impediments restricting the development of the lands i.e. all transportation and water services infrastructure needs to be in place. Sites which may require minor additional works or investment have also been identified as Tier 1 in certain circumstances. This is dependent on the nature and scale of the works required.

The identification of a site in Tier 2 highlights to landowners and potential investors that there are deficiencies in infrastructure that need to be addressed prior to the lands being developed. The nature of the deficiencies can vary between lands and settlements. **When considering what sites fulfilled the criteria of Tier 2 it was important to acknowledge that there are lands that can be partially developed without requiring additional infrastructure investment. This analysis has taken this into account, particularly in the larger sites, some of which have been identified as Tier 2 for this reason.**

The extent of which such lands could be developed would be dependent on the nature and scale of the development proposed and would be addressed in greater detail at the planning application stage.

Observation 3:

The planning authority should consider including a clear objective to implement an Active Land Management strategy, including the expansion of the measures to be included as part of its strategy. The ALM strategy should include site prioritisation, measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation of its Active Land Management strategy can be monitored and measured.

A range of other measures are relevant, such as provision of services and infrastructure through government funding initiatives, use of compulsory purchase orders (CPOs), derelict sites register, development contribution scheme, pilot projects, masterplans and alternative development management standards. To ensure effective implementation, the setting of site prioritisation, measurable targets and timelines against which the implementation can be monitored and measured would be appropriate.

Chief Executive's Response: The Council acknowledges the importance of Active Land Management in promoting and facilitating the re-use and redevelopment of vacant and under-utilised lands. It is considered that this is demonstrated in the Draft Plan in both the narrative and the policy objectives. This includes the inclusion of a land use zoning category 'Regeneration' which identifies key sites in urban areas which are being promoted for regeneration (Section 3.5.4 'Regeneration Areas'). There is also strong support for any project funded under the Urban or Rural Regeneration and Development Fund in addition to support for the rejuvenation of town centres through the section on Town Centre Living (section 3.7) and the Town Centre First Approach (section 5.24). It is anticipated that the introduction of a Vacant Site Levy as set out in section 3.5 will assist in incentivising the use and development of vacant and under-utilised lands. It is acknowledged that the Plan could benefit from a specific policy objective on Active Land Management.

Whilst the benefits of measurable targets and timelines in the implementation of an Active Land Management Strategy are acknowledged, it is often the case that securing the redevelopment of particular sites is dependent on a range of external factors beyond the control of the Local Authority. This includes funding, land ownership, site investigation works, and infrastructure constraints. These factors can also result in delays in the delivery of projects.

Taking the above into account, it is considered that a specific policy objective on Active Land Management is included in the Core Strategy.

Chief Executive's Recommendation: Insert a policy objective into the Core Strategy relating to Active Land Management

CS XX To promote, support, and facilitate the re-use of under-utilised or vacant lands, or lands identified for regeneration, through a co-ordinated approach to active land management between the Council and stakeholders.

3. Rural Housing and Regeneration

Observation 4:

It is advised that a clear rationale for the allocation of population and housing growth to the open countryside, outside of settlements, under the Core Strategy is provided in line with the requirements of NPO 20.

Chief Executive's Response: The Core Strategy projects a population increase of 1,753 persons over the plan period in the open countryside. The housing allocation to the open countryside was indicated as 871 over the plan period which represents an 8.3% increase of total population growth and not 10% as indicated in the OPR submission. This projection was based on the evidence of the total number of housing units permitted in the open countryside in County Louth over the last plan period.

At the time of preparing the Draft Plan there were no Housing Needs Demand Assessment Guidelines published to provide a methodology to the Planning Authority of how to project the demand for rural housing.

The projection of future rural housing demand based on previous demand and also factoring in likely population increases remains the most effective method of projecting the future demand for this type of housing. There is always a local desire to re-locate from higher tier settlements to the open countryside which also gives rise to increased demand for this type of housing which is managed through the provision of policy objectives in the County Development Plan.

This land management tool in conjunction with other policy objectives which focus on directing growth to the regional growth centres in the first instance, then the self-sustaining towns and other lower tier settlements in conjunction with policy objectives that seek to regenerate rural towns and villages and encouraging growth in these settlements will reinforce the settlement hierarchy for the County.

Chief Executive's Recommendation: No Change

Observation 5:

It is advised that the provisions of Policy Objective HOU 6 are extended to include for the monitoring and maintaining of a record the development of all housing in the open countryside outside of settlements.

Chief Executive's Response: The Planning Authority currently monitors and maintains a record of all residential development permitted in settlements and the open countryside. This policy should be amended to reflect this current practice.

Chief Executive's Recommendation: Amend Policy HOU 6 to read as follows:

Policy Objective	
HOU 6	To monitor and maintain a record of residential development permitted in settlements designated under the Settlement Hierarchy and development permitted in rural nodes and the open countryside in accordance with forthcoming Departmental guidance around the establishment of a HNDA coordination and monitoring unit and related implementation of a centralized spatial database for Local Authority Housing.

Recommendation 7:

The planning authority is required to review the qualifying criteria for its two rural housing zones with a view to omitting potential conflicts with the Flemish Decree, having regard to the restricting of consideration to persons who are native to the area, and to more fully align the rural housing with the provisions of NPO 19.

Chief Executive's Response:

The Decree of the Flemish Region of 27 March 2009 on land and real estate policy made the transfer of immovable property in certain Flemish communes conditional upon there being a sufficient connection between the prospective buyer or tenant and the relevant commune. The Department of Housing, Planning, Community and Local Government Circular Letter PL 2/2017 sets out that the European Commission originally issued an infringement notice against Ireland in 2007 in relation to the "local needs criteria" in the 2005 Sustainable Rural Housing Guidelines for Planning Authorities. This infringement notice was subsequently deferred pending the outcome of an infringement case taken against Belgium, now referred to as the Flemish Decree case and on which the European Court of Justice (ECJ) delivered its Judgement in 2013. In this Judgement, the ECJ ruled that the Flemish Decree constituted an unjustified restriction on fundamental freedoms under the Treaty on the Functioning of the European Union (the EU Treaty), in particular that it breached article 43 of the EU Treaty on the freedom of movement of citizens. Further to the ECJ Judgement in the Flemish Decree case, the European Commission re-engaged with the Department regarding the 2007 infringement notice and its previously expressed concerns in relation to the "local needs criteria" in the 2005 Guidelines. Requirements that planning applicants have occupational or employment related ties to the rural area in question are not considered problematical in this context as such criteria are non-discriminatory between locals and non-locals.

Under the Sustainable Rural Housing Guidelines for Planning Authorities 2005, planning authorities are required to frame the planning policies in their development plans in a balanced and measured way that ensures the housing needs of rural communities are met, while avoiding excessive urban-generated housing.

The National Planning Framework (the NPF) provides an important strategic basis for interpreting the 2005 Guidelines. National Policy Objective (NPO) 15 of the NPF fully supports the concept of the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

The Minister for Housing, Local Government and Heritage has indicated that the Sustainable Rural Housing Guidelines require updating, in a broader rural development and settlement context. To date, no draft has issued by the Department to assist local authorities in how to apply rural housing needs criteria having regard to the Flemish Decree and the need to balance and manage urban generated housing in the open countryside and the need to protect the environment and landscape of County Louth.

National Policy Objective 19 refers to “in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere: In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlement.” It was within this context that the local needs criteria in the Draft County Development Plan were prepared. The objective was to avoid an overly complex policy provision regarding local needs criteria for different areas and to ensure that those with demonstrable social or economic ties to the rural areas of County Louth would be accommodated subject to appropriate siting and design considerations.

Having regard to the Flemish Decree the use of the word ‘native’ could be construed as introducing a requirement that a person had to have been born in a specified place to qualify under rural housing needs. A definition provided for in the draft County Development Plan required the applicants to have lived in the area for 18 years and does not expressly provide that they had to have been born there. There was also no express provision that the 18 years had to be continuous and as such allowed for the movement of people for reasons of work, education etc. without losing the ability to meet the test of being able to qualify under the rural housing need. The word ‘native’ should be omitted so as to avoid any ambiguity regarding its definition in either planning or legal terms.

Chief Executive’s Recommendation: Amend the rural housing policy criteria **to remove any references to “native”** to ensure alignment with Flemish Decree.
See Rural Policy General – Composite Response.

Recommendation 8:

It is recommended that the rural housing policy be amended (i) To omit the following wording from rural housing policy Zone 1, qualifying criteria point 2 - ‘for 2no. dwellings, in addition to the family home,’ (ii) To provide for a more restrictive qualifying criteria (similar to proposed Zone 1 criteria) to be applied around the main settlements of the county (similar in extent to Zone 4 under the current plan, but extended to all settlements Levels 1-4), to avoid the exacerbation of existing urban sprawl evident around those settlements, having regard to the national objective for compact growth.

Chief Executive's Response: The wording of the draft Plan was intended to be construed as permitting a son or daughter of landowners to build on family lands but providing a cap of a total of three houses on the overall landholding. It is accepted that all policies should be written such that they are clear and unambiguous if they are to be interpreted and applied in a consistent and fair manner. Therefore, It is considered that this policy be re-worded such that no more than three dwellings shall be permitted on a family landholding.

With regards to the recommendation to provide for a more restrictive qualifying criteria (similar to proposed Zone 1 criteria) to be applied around all the settlements Levels 1-4, it was considered that this would not be required having regard to the significant changes that were being made to the qualifying rural housing criteria, housing need and the siting guidelines set out in this Draft CDP. Section 3.17.7 refers to Capacity of Areas to absorb future development. This section sets out that if it is considered that an area is becoming over-developed due to the proliferation of one off housing and the local infrastructure does not have the capacity to accommodate further development, it is unlikely that planning permission will be granted. Further details on the criteria and considerations for siting and design of one-off rural dwellings are set out in section 13.12 of the Development Management Guidelines in Chapter 13. However, should the rural housing criteria be amended whereby the qualifying criteria is relaxed further as a result of material amendments, it is considered that it would then become a requirement for more restrictive qualifying criteria to be considered to ensure that urban sprawl is managed effectively around the settlements of the County.

Chief Executive's Recommendation:

Amend Qualifying Criteria Point 2 of Rural Policy Zone 1 as follows:

A son or daughter of a landowner who are seeking to build a first home for permanent occupation. A qualifying landowner is defined as a person who owns a landholding of at least 3 hectares and has owned the land for a minimum of 10 years. Any applicant under this category must demonstrate a rural housing need and have demonstrable social or an economic need to live in the area and shall not have previously owned a dwelling. No more than three houses in total shall be permitted on the landholding (inclusive of the family home). Any application will be subject to the appropriate siting and consideration of proper planning and sustainable development.

Observation 6:

- (i) It is advised that, should level 5 settlement be included in the development plan, they be termed rural nodes.*
- (ii) It is advised that all references and policy support for the provision of multi-unit development within Level 5 settlements and/or in the open countryside are excluded from the development plan.*

Chief Executive's Response: The level 5 settlements are referred to in the settlement category as “rural villages” as distinct from the level 4 settlements which are considered to be more akin to small towns and villages category. It is accepted that there is disparity as to the existing level of housing and services available across these settlements. Having regard to the general lack of services available and that the intended population increase in these settlements would be commensurate with the existing population level and services available that would serve those with rural housing needs it is considered appropriate to refer to these settlements as “rural nodes”. The reference to “multi-unit developments” should also be omitted.

Chief Executive's Recommendation:

Change the wording of Level 5 ‘Villages’ to ‘Rural Nodes’.

See Rural Policy General – Composite Response

Remove reference to Multi-unit development from Section 3.17.6 to read as follows and include additional text as outlined:

Any applicants applying to build a new dwelling or person(s) purchasing a property in a multi-unit development in a Level 5 Rural Node settlements will be required to demonstrate a rural housing need in accordance with the rural housing policy set out in Table 3.5 of this Draft Plan. A person living in a Level 5 Rural Node and considered to qualify under Table 3.5 is considered eligible to build a dwelling in any Level 5 Rural Node.

Amend Policy Objective HOU 42 to read as follows:

Policy Objective	
HOU 42	To manage the development of new housing (including single dwellings and multi-unit developments) in Level 5 settlements by requiring applicants of new dwellings new single dwellings or persons purchasing a property in a multi-unit development to demonstrate compliance with the Local Needs Qualifying Criteria as set out in Table 3.5.

Recommendation 9:

It is required that the decision to include level 5 settlements should be informed by an evidence-based review to consider:

- (i) The purpose and effectiveness of these settlements; and*
- (ii) The potential implications of the policy, through densification of such unserved areas, in particular in terms of groundwater and surface water quality, road safety and sustainable transport.*

Chief Executive's Response: With regards to the purpose and effectiveness of these settlements, it is considered that there are community facilities and services available to residents in many of these settlements such as local school, shop, post office that serve a wider rural hinterland. The purpose of the settlement boundary for the Level 5s is to help discern the location where such services should be concentrated and also to promote infill rural housing at these locations that might otherwise be generated at dispersed locations giving rise to significantly more car dependent movements to and from primary schools, shops etc.

It is not intended that these rural settlements would accommodate urban generated housing and this has been addressed through the policy objective HOU 42 that requires applicants for houses in these settlements to demonstrate compliance with the Local Needs Qualifying Criteria as set out in Table 3.5. The purpose for this policy was to provide alternatives for those seeking to build a rural dwelling to firstly consider locating in rural nodes where community services exist that would contribute to an enhanced quality of life. It is also considered that rural dwellers are less inclined to re-locate to the larger settlements centres such as Drogheda or Dundalk, and as such there needs to be an attractive and viable alternative to the open countryside. The dispersed pattern and concentration of one-off housing cannot be sustained in the longer term with many areas already displaying characteristics of over-development. The Level 5s have an important function in helping to absorb infill housing and supporting the existing local services in the longer term.

Chief Executive's Recommendation: No Change

Recommendation 10:

The planning authority is required to remove the provisions regarding accommodation of backland development under section 13.9.43 of the plan.

Chief Executive's Response: This policy was inserted by way of Motion (No. 34) at the Council Meeting of the 1st October 2020 against the advice of the Officials for the reasons referred to by the OPR.

Chief Executive's Recommendation: Amend Section 13.9.43 Backland Development as indicated below:

13.9.43 Backland Development

The Council will not generally favour proposals which involve development located to the rear of established buildings, located along a private lane off public roads and which introduce a piecemeal form of backland development. This type of development results in a scattered arrangement of housing or clustered to the rear of existing properties and often long laneways to reach the properties. It is not respectful of the traditional settlement pattern, creates a built-up appearance thereby eroding the rural character and further fragmenting agricultural lands, reduces residential amenity standards and can have an impact on traffic safety.

~~Backland Development will only be considered in Rural Policy Zones 1 and 2 where the applicants' site has been owned by the family for at least 15 years and the landholding is at least 1.5 hectares. Only one dwelling will be permitted per landowner. Any backland development should be accompanied by a deed of right of way to the proposed dwelling and must not have a negative impact on traffic safety.~~

Observation 7:

It is advised that Policy Objective HOU 39 be rephrased from 'within the existing footprint of rural settlements' to 'within the existing footprint of small towns and villages'.

Chief Executive's Response: There is no objection to amending the wording as per the observation.

Chief Executive's Recommendation: To amend the wording of Policy Objective HOU 39 as follows:

Policy Objective	
HOU 39	To support the development of a 'New Homes in Small Towns and Villages' initiative in consultation with Irish Water, local communities, and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements. <i>the existing footprint of small towns and villages.'</i>

Observation 8:

It is advised that the development plan include a more proactive strategy for the regeneration of rural towns and villages in order to provide for, facilitate and support those who wish to build their own house within the settlement boundaries of a small town or village, and to ensure that such locations are an attractive alternative to one-off housing in the countryside. The planning authority should consider what objectives can be included in this regard and what measures are feasible as commitments in the plan, including a range of appropriate active land management measures. The inclusion of clear targets and provisions for monitoring and reviews of the strategy should also be considered.

Chief Executive's Response: The settlement hierarchy for the County acknowledges the important role that rural towns and villages play in supporting the rural communities of County Louth. Indeed the Council actively welcomes and supports proposals through the development management process which seek to bring back into use underutilized or vacant structures in rural towns and villages. The Draft Plan provides for a revision to the land-use zoning categories and now provides for a list system of uses that are acceptable or open for consideration. The removal of the 'not permitted' matrix demonstrates the commitment from the Council to assess all legitimate development proposals against their compatibility with existing land-uses rather than providing for a prescriptive development management response. This is increasingly pertinent in a rapidly changing technological world and also having regard to the changes around work-life balances that the current Covid-19 pandemic has given rise to.

The Council's strategy to providing a more proactive strategy for the regeneration of rural towns and villages is demonstrated in the Core Strategy figures, which has seen the allocation of population to the Level 4 and Level 5 settlements similar to that allocation to the self-sustaining towns (Level 3 settlements). Strategic Objective SO 14 acknowledges the need to reverse rural decline in small towns and villages through sustainable, targeted measures addressing vacancy and delivering sustainable reuse and regeneration outcomes.

Policy Objective HOU 39 expressly demonstrates the Council's commitment to support the development of a 'New Homes in Small Towns and Villages' initiative in consultation with Irish Water, local communities, and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities.

While additional active land management tools will be utilized by the Council these need to be carefully considered so that they are achievable and measureable in terms of their success.

Moreover, such measures will require a collaborative approach and may well require funding so that the Council is in a position to potential schemes such as serviced sites, bringing back into use vacant sites etc. These policies are supported in principle by the Council and have been included in the Draft CDP. Further, the Council has also appointed regeneration officers who will also have a role in examining more active land management tools that can be utilized by the Council. These tools while supported by the development plan policies are better managed through the development management section. The implementation of such tools requires an evidence-based approach and tailored responses which allow for the establishment of baseline with specific target objectives that are measureable. This will be particularly important following the Covid pandemic which acted as a disruptor to traditional work patterns and consumer behaviour.

Chief Executive's Recommendation: No Change

4. Economic development and employment (including retail)

Observation 9:

The planning authority should satisfy itself that the proposed Mixed Use zone (C1) located between Dundalk and Blackrock will not have a significant adverse retail impact on Dundalk town.

Chief Executive's Response: These lands form part of the Mullagharlin Framework Plan in the Character Area 'Finnabair South'. This mixed use area is envisaged as consisting of employment, commercial development, health care, student and residential housing and may also incorporate links to the adjacent Dundalk Golf Course. The type of uses envisaged on these lands includes a mixture of higher order business uses supported by cafes/restaurants, community facilities, office, health care, residential, and business units. Large scale retail or warehousing and distribution will not be considered appropriate on these lands.

In order to clarify the uses considered acceptable on these lands it is recommended that a spot objective is inserted on the land use zoning map and in Table 13.2 'Spot Objectives' indicating the intended use of the lands.

Chief Executive's Recommendation: Insert a Spot Objective for the Mixed Use zoned lands in the southern part of Dundalk that forms part of the Mullagharlin Framework Plan

Spot Objective Number	Location	Objective
11	Dundalk	To provide for a mixture of higher order business uses supported by cafes/restaurants, community facilities, office, health care, residential, and business units. Individual shops in excess of 350m ² gross floorspace or warehousing and distribution will not be considered appropriate.

5. Sustainable Transport and Accessibility

Observation 10:

The planning authority is requested to review the movement and transport strategy under Chapter 7 of the draft plan to appropriately reference and implement through the development plan the requirements under section 10(2)(n) of the Act.

Chief Executive's Response: It is acknowledged that the requirement to promote measures to reduce energy use and greenhouse gas emissions as set out in section 10(2) (n) of the Planning and Development Act 2000 (as amended) is not specifically referenced in Chapter 7 'Movement'. However the policy objectives and supporting narrative in the chapter acknowledges the need to place a greater emphasis on more sustainable modes of transport and make walking, cycling, and public transport more attractive in order to reduce the dominance of the private car as the primary mode of transport. Taking this into account it is recommended that additional text is inserted into chapter 7 referring to section 10(2)(n) of the Planning and Development Act 2000 (as amended) and include additional policy objectives where considered necessary.

Chief Executive's Recommendation: Insert additional text into chapter 7 referring to section 10(2)(n) of the Planning and Development Act 2000 (as amended) and include additional policy objectives where considered necessary. (Additional text in red and deleted text in blue with a ~~striketrough~~)

Insert the following section before section 7.4 'Integration of Land Use and Transport Planning'

7.4 Transportation and Climate Change

In 2017 transport accounted for 19.8% of greenhouse gas emissions in Ireland. The Climate Action Plan, published by the Government in 2019, sets out a series of policy actions that will support a reduction of emissions from the transport sector by 2030. This includes a reduction in CO₂ emissions by 45-50% relative to 2030 pre-NDP projections, an increase in the number of Electric Vehicles, and investment in sustainable mobility projects that will assist in increasing the modal shift towards sustainable modes of transport.

Section 10(2)(n) of the Planning and Development Act 2000 (as amended) requires development plans to include objectives relating to the promotion of sustainable settlement and transportation strategies including measures to reduce energy costs, greenhouse gas emissions, and adaptation to climate change.

This Plan recognises the need to transition to a low carbon society and will support the implementation of any plans or programmes that will assist in meeting national targets on greenhouse gas reductions from transport related activities. In achieving these targets consideration will be given to the 'Avoid-Shift-Improve Framework' which seeks to deliver sustainable transport systems by:

- i) Improving the efficiency of the transport system e.g. through more integrated land use and transport planning;
- ii) Improving trip efficiency by promoting a modal shift from private cars to non-motorised transport (i.e. walking and cycling) or public transport;
- iii) Improve vehicle and fuel efficiency and promote innovation in transport infrastructure.

The Council will work closely with government agencies and in particular the National Transport Authority (NTA) in improving public transport infrastructure and services and walking and cycling infrastructure in the County through a range of measures including:

- i) The preparation of Local Transport Plans for the larger settlements of Drogheda and Dundalk, which will seek to improve the integration of land use and transportation;
- ii) The implementation of the Rural Mobility Plan 'Connecting Ireland' which is currently under preparation by the NTA, which seeks to improve mobility in rural areas and provide better connections between villages and towns by an linking the settlements through an enhanced regional network;
- iii) The progression and implementation of sustainable mobility projects funded by the NTA.

It is anticipated that by taking a co-ordinated approach at a local and national level to invest in such transport infrastructure and services there will be a shift towards more sustainable modes of transport which will assist in reducing greenhouse gas emissions in accordance with national policy and targets.

Policy Objective

MOV XX To support the implementation of the National Climate Action Plan 2019, and in particular the measures included that will assist in achieving the target of CO₂ emissions reduction by 2030 in the Transport sector as set out in section 10.2 of the Climate Action Plan.

Recommendation 11:

In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n), the planning authority is required, in consultation with the NTA, to include:

- (i) Appropriate existing baseline figures for modal share at individual settlement level for the higher order settlements, and at aggregate level for rural villages and the open countryside, as identified in the Core Strategy.*
- (ii) Realistic targets for modal change against the baseline figures provided under (i), above, to form a basis for an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and its climate change strategy.*

Chief Executive's Response: The Council has engaged closely with the NTA in the preparation of the Draft Development Plan and has utilised any data available with regards to modal share. An additional table can be inserted into section 7.5.1 'Current Travel Patterns' detailing the modal share for students and workers in the higher tier settlements of Drogheda, Dundalk, Ardee, and Dunleer. Whilst the benefit of having a target for modal change is acknowledged, there is no national target available on which the Draft Plan can align with. In the absence of such information and guidance the Council is not in a position to provide a well informed target for inclusion in the Plan. In addition it is considered that the setting of any targets should be agreed between all the stakeholders i.e. the Local Authority and the transport agencies as it will require a multi-agency approach in the funding and delivery of sustainable transport projects if any targets identified are to be achieved.

The Council will continue to work closely with the various stakeholders and agencies in promoting sustainable transport projects and a shift away from a dependence on the private car. As part of the preparation of the Local Transport Plans for Drogheda and Dundalk more detailed analysis of the modal share will be carried out. In addition the Council, in partnership with the NTA, may be in a better position to provide information on potential targets at a settlement level.

Chief Executive’s Recommendation: Insert the following additional text and table into section 7.5.1 ‘Current Travel Patterns in the County’:

At a settlement level the breakdown of the modal share follows a similar pattern to that at a County level. It is notable however that in Drogheda and Dundalk there are higher levels of people walking to school and work, whilst in Dundalk the number of people cycling to work is higher than that of the other settlements and County. In Drogheda the number of workers travelling by train is over twice that in Dundalk. This is all an indication that in larger urban areas where there are more opportunities to walk and cycle and there are more public transport services available, more people will use choose to use these modes of transport.

Table 7.1: Modal Share for Students and Workers in Higher Tier Settlements 2016

Mode of Transport	Work				School or college			
	Drogheda	Dundalk	Ardee	Dunleer	Drogheda	Dundalk	Ardee	Dunleer
Walk	16.1%	13.1%	11.5%	10.2%	34.7%	33.6%	33.3%	38.3%
Cycle	1.6%	5.2%	1.7%	0.3%	1.2%	2.6%	1.1%	0.5%
Bus	5.7%	5.9%	4.3%	4%	22%	16.2%	15.3%	12.9%
Rail	3.8%	1.4%	0.2%	0.7%	1.3%	0.2%	0.1%	0%
Car (driver)	60.4%	60%	64.9%	69.4%	2.4%	3.2%	5.1%	5%
Car (passenger)	6.2%	8.1%	5.2%	4.8%	38.2%	43.9%	44.1%	42.8%
Van	4.3%	4.3%	9.7%	6.9%	0.1%	0.2%	0.1%	0.5%
Work mainly at home	1.9%	2.1%	2.6%	3.7%	0.05%	0.1%	0.8%	0%
Total	100%	100%	100%	100%	100%	100%	100%	100%

Observation 11:

It is advised that the movement and transport strategy appropriately acknowledge and support the role of transport demand management. In addition:

- (i) The car parking standards under table 13.11 should be reviewed through an evidence-based approach, in consultation with the NTA to ensure that the standards to apply to each tier and for each use are justified;*
- (ii) The parking standards should be set as maximum standards in Areas 1 and 2; and*
- (iii) Provision should be made to accommodate development with no parking requirement under certain circumstances, in appropriate locations.*

Chief Executive's Response: Transport Demand Management (TDM) is the implementation of measures which seek to change travel patterns by a range of measures including modal shift, trip reduction, reduction in trip length, reduction in vehicle use, and increase in vehicle occupancy. Whilst the Plan does not make specific reference to the term 'Transport Demand Management' it does support the implementation of the principles of the concept. This could be addressed by the inclusion of additional text in section 7.5 'Sustainable Transport'. As part of the preparation of the Draft Plan a review of the Car Parking Standards was carried out. Taking account of the availability of public transport within Louth as a viable alternative to the car as a means of travelling to school, work, or to socialise, the car parking standards are considered appropriate.

With regard to maximum car parking standards it is considered that this can be assessed on a case by case basis at the Development Management Stage whereby any proposal that includes a car parking provision in excess of the standards set out in Table 13.11 can be assessed taking account of the location, future occupants or intended customers, and the availability of public transport in the area.

Section 13.14.12 includes a narrative regarding a reduction in the car parking requirement. This could be expanded to include a reference to a proposal with no car parking provided.

Chief Executive's Recommendation: Insert additional text into section 7.5 'Sustainable Transport' in relation to Transport Demand Management (additional text in red and deleted text in blue with a ~~strikethrough~~)

7.5 SUSTAINABLE TRANSPORT AND TRANSPORT DEMAND MANAGEMENT

As people have become more mobile the carbon footprint of transport activities has grown, with the private car becoming the dominant mode of transport.

It is recognised that a greater emphasis will have to be placed on more sustainable modes of transport in order to mitigate against the potential impacts of climate change and to remove congestion from our towns and villages and make them more attractive places to explore. This will require stronger support and increased priority for cycling, walking and public transport infrastructure and a greater uptake in the use of cleaner, low emission vehicles.

The shift towards more sustainable modes of transport will only occur if people are provided with affordable, accessible and cleaner alternatives.

These measures will be implemented through a concept known as ‘Transport Demand Management’, which seeks to change travel patterns by a range of measures including modal shift, trip reduction, reduction in trip length, reduction in vehicle use, and increase in vehicle occupancy. This Plan will support the implementation of Transport Demand Management measures in consultation with the National Transport Authority.

The following sections of this Chapter will set out the various sustainable modes of transport in Louth. Prior to reviewing these modes of transport an analysis of current travel patterns in the County will be carried out.

Insert additional text into the first paragraph in section 13.14.12 ‘Car Parking Standards’ as follows:

A **development that provides no car parking or a** reduction in the car parking requirement may be acceptable where the Planning Authority is satisfied that: (see section 13.14.12 for the list of criteria).

Observation 12:

The planning authority is requested to amend the development management standards and any other such references in the plan to: (i) To ensure the plan is consistent with the requirements of the Design Manual for Urban Roads and Streets (2019), making clear that the said standards apply to all development within urban areas within the 60kph and 50kph zones; (ii) To make clear that the standards under section 13.14.17 and in table 13.13 do not apply in locations referred to under (i); and (iii) To appropriately reference the appropriate road design standards including DMURS and TII’s road design standards and the locational contexts to where they will apply.

Chief Executive’s Response

The Draft Plan is consistent with the requirements of the Design Manual for Urban Roads and Streets (2019). In order to clarify the concerns raised in the submission additional text can be inserted into section 13.14.17 ‘Entrances and Sightlines’ detailing the context in which DMURS is applicable.

Chief Executive’s Recommendation: Insert the following additional text into paragraph 2 of Section 13.14.17:

All new entrances and junctions will require clear and unobstructed sight lines to be provided. These sight lines shall be selected using the applicable road design manual TII Design Manual for Roads and Bridges or **if the development is in towns and villages or where the speed limit is within the 60km/h zone** the Design Manual for Urban Roads and Streets. ~~and~~ **Any development** shall take the following criteria into consideration:

Amend the final paragraph of section 13.14.17 as follows:

Table 13.13 sets out the minimum visibility standards for new entrances **onto streets and roads where the speed limit is in excess of 60km/h and the Design Manual for Urban Roads and Streets is not applicable**. These are minimum standards and the Authority can request greater standards depending on the characteristic of the road, observed traffic speeds, volume and type of vehicles, etc.

Insert the following footnote to Table 13.13:

“These standards do not apply to any new entrance where the Design Manual for Urban Roads and Streets is applicable.”

Recommendation 12:

It is recommended the provisions of section 7.9 of the plan are revised, in consultation with TII and in accordance with their advice, so as to be consistent with the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

Chief Executive’s Response: It is assumed that the issue raised is in reference to the exemptions included in Table 7.5 regarding access on to National Roads. With regard to these exemptions they would only be applied in exceptional circumstances where TII have been consulted beforehand.

The Council is committed to safeguarding the national road network and in this regard considers it sensible and logical to include a provision for a new access on to a national road where a traffic hazard can be eliminated. Indeed there have been recent applications granted by the Council and supported by TII for such developments.

The inclusion of the exemption relating to the extension of an authorised use subject to it not creating a traffic hazard will require a consultation with TII. As previously indicated taking account of the fact that the Council is committed to safeguarding the national road network such a development would only be facilitated where it is demonstrated the development would not create a traffic hazard or undermine the capacity or safety of the national road network.

Any proposal for a major employment generating development or a development of national or regional importance that would require a new access on to a national road would only be considered in exceptional circumstances where there is a locational specific reason for the development to be accessed off a national road. Again, this would require prior consultation with TII.

The final exemption refers to an access to a fixed natural resource of national or regional importance. The provision of such an access would only be facilitated in exceptional circumstances, with a consultation with TII required.

The intention of these exemptions is to provide clarity for situations when an access on to a national road may be considered. As previously indicated the Council is committed to safeguarding the capacity and safety of the national roads that travel through Louth and the County has worked closely with the TII in eliminating traffic hazards along the national roads in Louth. Any application submitted under these exemptions will be assessed taking account of the potential impacts on the capacity and safety on the national road network and a decision will be made in consultation with TII.

Chief Executive’s Recommendation: No Change

6. Climate Action and Energy

Recommendation 13:

The planning authority is required to review the Strategic Flood Risk Assessment, in consultation with the OPW, to ensure consistency with the Flood Risk Planning Authorities and Flood Risk Management Guidelines (2009), as revised. The land use zoning objectives under the draft plan are also required to be reviewed and amended, having regard to the revised SFRA, and in accordance with the application of the sequential approach, and the Justification Test where appropriate.

For detailed response please refer to OPW Submission LCDP 629

Recommendation 14:

In accordance with the provisions of section 28(1C) of the Act, the planning authority is required to amend the draft development plan in order to fully implement the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change.

Changes to Section 10.5 and 10.6 have been made on foot of the submission. These are attached at the end of the OPR submission as they are quite substantial.

Acknowledgement of the policy objectives contained within the Draft Plan concerning renewable energy and consistency with the National Policy Objectives of the NPF and the Regional Policy Objectives of the RSES is noted and welcomed.

The Council, in IU 47 has undertaken to prepare a Renewable Energy Strategy for County Louth within the lifetime of the Development Plan. Notwithstanding this, it is understood that prioritisation for producing this document is paramount and the need for a specified timeline required.

In this regard, it is considered that as Wind Energy will be a foremost consideration within the Renewable Energy Strategy, that the adoption of the Revised Wind Energy Guidelines (2019) is critical to its preparation. Consequently, and in accordance with the request of the OPR, the inclusion of an appropriate time limit is considered appropriate. It is recommended that the following additional text be included in IU47 to read as follows:

Policy Objective

IU 47	To produce a Renewable Energy Strategy for County Louth within one year of adoption of the Revised Wind Energy Guidelines . This Strategy shall have regard to 'A Methodology for Local Authority Renewable Energy Strategies', (SEAI) and shall be compliant with the requirements of SEA & Habitats Directive.
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With regard to the narrative and policy objective relating to district heating, the concerns that this needs to be more directive and informed by the use of heat mapping and a feasibility study as per Regional Policy Objective RPO 7.38 of the RSES is noted. As outlined in IU 47, it is an objective of the Council to prepare a Renewable Energy Strategy which will address the full range of renewable energy sources available to Louth including District Heating, wherein heat mapping and a feasibility assessment will inform policy. Notwithstanding this, it is recommended that additional text be included in the Draft Plan narrative and supported by new policy objectives to read as follows:

New Narrative: 10.8.2.

In accordance with RPO 7.38 of the RSES, Louth County Council will utilise heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. Further, the Council will carry out a feasibility assessment for district heating within its functional area and shall identify local waste heat sources.

New Policy Objective:

Policy Objective	
IU XX	To ensure the use of heat mapping to inform the best and justifiable location for district heating schemes.

New Policy Objective:

Policy Objective	
IU XX	The Council will carry out a feasibility assessment for district heating schemes and shall identify local waste heat sources accordingly.

In relation to indicating how implementation of the Development Plan will contribute to realising national targets on renewable energy and climate change mitigation, it is considered that both the narrative and the associated policy objectives particularly of Chapter 10 and Chapter 12 support these national targets.

The need to develop our renewable energy sources and the implications of this are clearly identified in line with National, European and National policies. There are many robust policy objectives which through their implementation will contribute to the realisation of the national targets. These seek to support initiatives which limit and reduce emissions of greenhouse gases through both energy efficiency and the development of renewable energy sources, the production of a Renewable Energy Strategy, and the identification of, in conjunction with EMRA, Strategic Energy Zones. These general policy objectives are further supported by more specific policy objectives which encourage and support the development of; on-shore wind energy, off shore wind energy, solar energy, bioenergy, hydro energy and small scale renewables.

In light of the observations raised in the submission and the recommendations attached thereto, the Council considers it appropriate that additional text be included in Section 10.5 and Section 10.6 of the Draft Plan as it relates to Energy, Renewable Energy and Wind Energy. It is proposed to delete text where it is redundant or repetitive and to reference the Climate Action Plan 2019 and acknowledgement of the 70% target for electricity generated from renewable energy by 2030 in addition to the National Development Plan. These amendments are presented below.

With regard to realising national targets and in particular wind energy production and potential wind energy resource in megawatts, in the absence of baseline data, an evidence based response and justification of a quantum figure in megawatts to meet the recommendation as proposed above, is not possible at this stage of the Development Plan review process.

However, the Council acknowledges that it is critically important that it plays its part in achieving national targets and is fully committed to comprehensively addressing these requirements during the preparation and production of the Renewable Energy Strategy, which is to be undertaken within one year of adoption of the Revised Wind Energy Guidelines. The Renewable Energy Strategy will establish the necessary baseline data and inform how Louth can meet its renewable energy targets in terms wind energy resource in megawatts. It should be noted that pending the Renewable Energy Strategy, that the council will, in the interim continue to assess all planning applications against the principles of achieving national targets on renewable energy and climate change mitigation.

7. Environment, Heritage and Amenities

Observation 13:

It is advised that appropriate details and maps of the intended routes for proposed greenways should be included in the development and the planning authority should satisfy itself the these details are fully taken into account as part of the Appropriate Assessment of the plan.

Chief Executive's Response: Whilst the merits of including maps of the intended routes of the greenways are acknowledged the greenways to be delivered as part of the coastal defence schemes are dependent on them being able to be incorporated into the schemes. The design of these schemes is at an early stage with no decision made on the types of flood defences to be used or how the greenway, cycleways, pedestrian paths, or public realm improvements can be incorporated into the schemes. Further details may be available when the LAP is being prepared.

Chief Executive's Recommendation: No Change

Changes to Section 10.5 and 10.6 as referenced in relation to Recommendation 14 above:

10.5 Energy

10.5.1 Introduction

Energy is an essential component of Ireland's economy and society. Continued growth in County Louth, with respect to both population and the economy, will require energy to power businesses, homes, transport and public services. A reliable, resilient and efficient energy system that caters for growth year round and across all sectors, will be required to underpin the future development of the County.

Louth requires world class energy infrastructure which is fit for purpose and, in this regard, our native renewable energy sources need to be developed. Such development will reduce dependence on fossil fuels and external sources, improve energy mix and provide a secure and resilient supply, reduce greenhouse gas emissions creating environmental benefits and protect against climate change.

A reduction in our dependence on foreign fossil fuels will simultaneously provide positive social, economic and environmental dividends.

Renewable energy can be defined as energy developed from sources that are constantly replenished through the cycles of nature and unlike fossil fuels, are not finite. International, European and National policies all seek and support a more energy efficient society relying on sustainable renewable energy sources.

~~Energy targets set out in EU legislation have been translated into the *National Renewable Energy Action Plan (NREAP) 2010* and the *National Energy Efficiency Action Plan (NEEAP) 2013-2020* (updated 2014). Ireland intends that by 2020 the 16% target of national gross final energy consumption from renewable sources will be achieved by delivering approximately 40% of energy consumption from renewable sources in the electricity sector, 12% in the heat sector and 10% in the transport sector.~~

~~The NEEAP sets out how the Government aims to deliver a 20% reduction in energy demand (over average of 2001-2005 levels) across the entire economy, through a selection of energy efficiency measures. In this regard, the Government believes that the public sector should lead by example and has assigned an energy demand reduction target of 33% to the public sector by the year 2020.~~

This Draft Plan promotes energy efficiency and the development of indigenous renewable resources. The Development Plan can progress a sustainable energy future for the County, by recognising the importance of land use and transportation planning in promoting a low carbon society and mitigating the impacts of climate change.

10.5.2 Renewable Energy:

Ireland's geographic location on the western edge of Europe accentuates our need for secure and continuous energy supplies, especially where our expenditure on energy imports remains significant. National policies promoting energy efficiency and sustainable renewable energy sources will ensure we secure our international competitiveness by increased use of and demand for indigenous resources and increased security of supply.

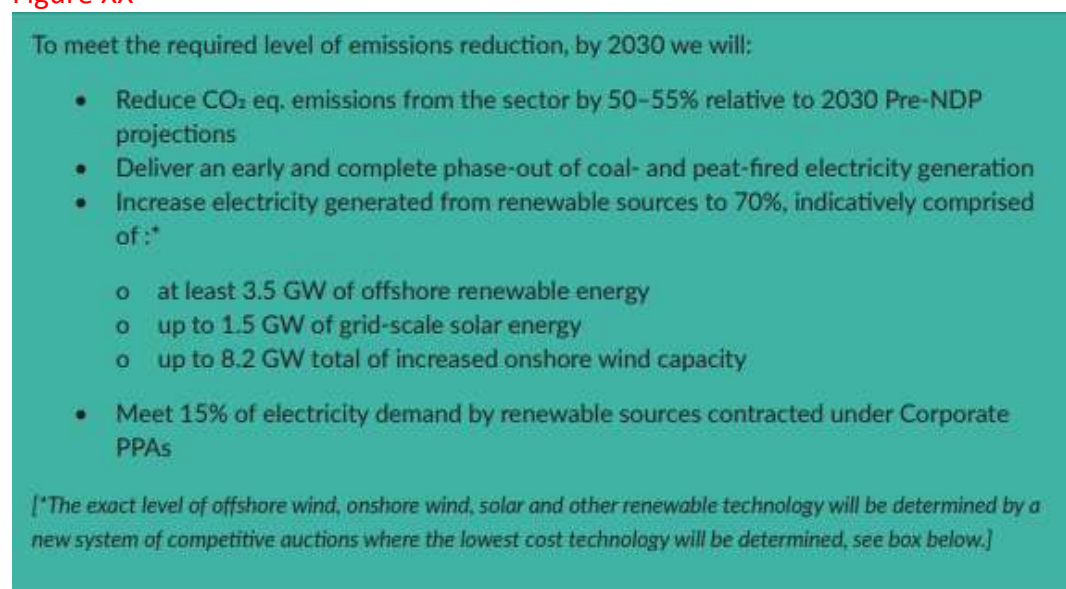
~~The *National Climate Policy Position on Climate Action and Low Carbon Development* establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy. The Government supports the adoption of a net zero target by 2050 at EU level.~~

The Climate Action Plan 2019 puts in place a decarbonisation pathway to 2030, which would be consistent with the adoption of a net zero target in Ireland by 2050. ~~The evolution of climate policy in Ireland will be an iterative process based on the adoption by Government of a series of national plans over this period.~~

From a national perspective, to achieve the target of 70% renewable electricity by 2030, the Climate Action Plan 2019 identifies that to meet the required level of emissions reduction by 2030 that certain identified targets need to be met and which are detailed in Figure XX below. This will involve phasing out coal- and peat-fired electricity generation plants, increasing renewable electricity, reinforcing the grid and putting systems in place to manage intermittent sources of power, especially from wind.

The Council acknowledges that it is critically important that it plays in part in realising national targets and this will be achieved through the inclusion of supporting policy objectives for renewable energy generation and development and through the preparation of a Renewable Energy Strategy.

Figure XX



The National Planning Framework establishes a single vision for all communities in accordance with 10 shared goals identified as National Strategic Outcomes and herein NSO 8 recognises the national objective of achieving a transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. This recognises that new energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing the considerable onshore and off shore potential from a range of energy sources including wind, wave and solar and connection to major sources of demand. The Council in the Draft Plan will seek to support the NPF in harnessing the potential of the Eastern and Midland Region in renewable energy terms across the technological spectrum in helping to realise national targets.

The Eastern and Midland Regional Spatial and Economic Strategy recognises the need to shift from a reliance on fossil fuel usage to a more diverse range of low and zero carbon sources, thereby supporting an increase in renewable energy sources across the technological spectrum within the Region.

EMRA seeks to identify, in conjunction with its constituent Local Authorities within the Region, Strategic Energy Zones (SEZ) as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. **This would contribute to the delivery of the targets set in the Climate Action Plan in respect of renewable energy.** The SEZ will ensure all environmental constraints are addressed in the analysis.

The need for early stakeholder engagement is critical as effective community engagement is essential for building public confidence and helping the Country, the Region and the County in achieving a transition to renewable energy.

~~Renewable energy is derived from nature's continuously replenished natural sources.~~



The renewable energy options for County Louth include the following:

- Wind Energy (On-shore and Off shore);
- Solar Energy;
- Water Energy (hydro, wave and tidal);
- Heat Pump Systems (including geothermal);
- Bioenergy; and
- Waste Material.

At a national level, much of the growth in renewable energy has been derived from wind energy but Ireland has significant further renewable energy resource potential, which includes for solar, tidal, bioenergy and wave.

The Government is investigating opportunities to develop Ireland's abundant offshore renewable energy resources including offshore wind, wave and tidal energy in recognition of their rich potential offering in the coming decades. Given its coastal location, Louth has a clear part to play in the development of renewable energy and the provision of such alternative energy resources will be considered on suitable sites throughout the county.

The Council recognises the range of new and developing technologies that can contribute to minimising greenhouse gas emissions, providing a secure and stable energy supply and securing a greater proportion of our energy from renewable sources.

In 2017 the Department of Housing, Planning, Community and Local Government published 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' under Section 28 of the Planning and Development Act 2000 (as amended) which included a Specific Planning Policy Requirement concerning policies or objectives that relate to wind energy developments and requirements of planning authorities in this regard. In considering renewable energy the Council has had regard to the following documentation

- The National Renewable Energy Action Plan 2010 (Irish Government submission to the European Commission);
- The Government's Strategy for Renewable Energy 2012 – 2020 (DCENR);
- The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR); and
- The Government's National Mitigation Plan, July 2017 (DCCAE).

In relation to renewable energy, the Council will consider full legislation provision and supporting guidance, policy documents etc. issued by the relevant department to give effect to legislative provisions.

10.5.2.1 Energy Efficiency

The Council supports the concept of generating renewable energy at a 'local' level and is cognisant of the benefits that consequently accrue to local communities.

Local community engagement will form a key part of the Council's future energy strategy, to inform people of the economic, environmental and social benefits of moving away from solid/fossil fuels towards a low carbon economy.

The Council will endeavour to:

- Promote the rational use of energy;
- Promote renewable energy;
- Promote and disseminate energy information;
- Protect the environment;
- Reduce energy waste in all sectors of society, and;
- Encourage the replacement of imported fossil fuels with regionally generated renewable energy in an effort to ensure security of energy supply, where it is feasible.

~~Ireland's target is to achieve a 20% reduction in greenhouse gas emissions by the end of 2020. Ireland will need to reduce its non-ETS greenhouse gas emissions (i.e. emissions from other than electricity generation and large industry) by 30% by 2030, compared to 2005. The Government supports a net zero emissions target by 2050 at EU level and the Climate Action Plan puts in place a roadmap to 2030 to enable a net zero emissions target in Ireland by 2050.~~

10.5.2.2 Louth Sustainable Energy Action Plan

The Louth Economic Forum devised an overall 10 point plan which identified 10 specific topics to be addressed within its work programme. This included a Sustainable Energy Action Plan, the objective of which is to help sustain, support and create jobs through developing the concept of Louth as a leader in the delivery of the Green Economy. Its objectives include building on and replicating sustainable energy best practices developed in Dundalk to elsewhere in the County, assisting local business to be competitive through energy efficiency supports and allowing green businesses use County Louth as a living laboratory to develop their products and services.

10.5.2.3 Renewable Energy Strategy

Louth County Council is committed to supporting investment in renewable energy and to developing a robust and sustainable Renewable Energy Strategy (RES) for the County. It will be informed by and aim to deliver on the Climate Action Plan 2019 targets (and any revisions thereto) and position the County as a leader in renewable energy generation, supporting energy efficiency and conservation.

The RES will outline the potential for a range of renewable resources, including *inter alia* onshore and offshore wind, solar, bioenergy, geothermal, hydro, wave and tidal energy. It will establish baseline data and set out the renewable energy resource targets for the County to 2027, seeking a sustainable balance of renewable energy sources. Consistent with the Development Plan the RES will acknowledge the contribution that can be made to Louth being more energy secure, less reliant on traditional fossil fuels and meeting assigned national targets.

Recommended Additional Text to Policy Objective IU 47:

Policy Objective	
IU 47	To produce a Renewable Energy Strategy for County Louth within one year of adoption of the Revised Wind Energy Guidelines. during the lifetime of this Development Plan. This strategy shall have regard to 'A Methodology for Local Authority Renewable Energy Strategies', (SEAI) and shall be compliant with the requirements of SEA & Habitats Directive.

10.6 Wind Energy

Wind energy is currently the largest contributing resource of renewable energy in Ireland and is both Ireland's largest and cheapest renewable electricity resource. In 2018 wind provided 85% of Ireland's renewable electricity and 30% of our total electricity demand. Ireland is one of the leading countries in its use of wind energy and is the second greatest source of electricity generation after natural gas.

The Council recognises the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions. In the next decade, onshore wind will continue to be Ireland's main source of renewable energy. Such a radical shift away from our current reliance on fossil fuels will require significant changes nationally to the grid, existing infrastructure, legislation and the regulatory framework. These changes are necessary and crucial if the Country is to move to a more sustainable energy system.

The Council will continue to support and encourage the principle of wind energy development in accordance with Government policy and having regard to the Wind Energy Development Guidelines for Planning Authorities or any update made thereto during the lifetime of the Plan.

A wind energy Strategy will be an intrinsic element of the Renewable Energy Strategy and will be informed by the targets for onshore wind capacity as set out in the Climate Action Plan 2019 (8.2 GW of increased onshore wind capacity), targets which the Council will want to successfully help to achieve.

The Council is also mindful of Louth's diverse landscapes with varying degrees of sensitivity to wind energy generating infrastructure and therefore care will need to be exercised in the location and siting of such infrastructure.

10.6.1 Off Shore Wind Farms Development

~~Future large scale wind generation may be located off the Louth coast which presents~~ Louth, with its considerable coastal extent presents significant opportunities for economic development in serving off shore wind farms developments. The Climate Action Plan 2019 expects the connection of at least 3.5GW of offshore renewable energy to the grid by 2030. An off shore wind energy strategy will be an integral part of the Renewable Energy Strategy.

Submission No.	LCDP DR099
Submitted by:	Eastern and Midland Regional Assembly Submission (EMRA)

Summary of Submission

The Assembly acknowledges the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and welcomes the overall approach and effort of Louth County Council to coordinate and incorporate policies and objectives, so that they are consistent with the NPF and RSES.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission.

The submission broadly follows the chapter headings of the Draft Development Plan.

1. Introduction

The Assembly welcomes the approach taken to achieve national and regional alignment, recognising the RSES Regional Strategic Outcomes (RSOs) and aligning with the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

It is considered that the demonstration of alignment would also benefit from the inclusion of Figure 2.4 of the RSES which identifies these 16 specific RSOs.

Chief Executive's Response: In the interest of clarity and continuity, the Council fully concurs with the recommendation for inclusion of Figure 2.4 of the RSES identifying the 16 specific RSO's into Chapter 1, Section 1.9

Chief Executive's Recommendation: Insert Figure 2.4 of the RSES into Chapter 1, Section 1.9.

2. Core Strategy and Settlement Strategy

The Assembly acknowledge the clear and evident work that has gone into the preparation of Chapter 2 which details the Core Strategy and Settlement Strategy.

The population section of the Core Strategy would benefit from a short explanation to the calculation of this projected annualised figure for 2027.

Chief Executive's Response:

The NPF Implementation Roadmap provided population projections for 2026 and 2031.

Taking account of the fact that the plan period is up to 2027 an annualised average population increase during the 10 year period 2016-2026 was calculated and this figure was added on to the population projection for 2026 to give a population projection for 2027.

This calculation is set out in the following table:

Population 2016	Projected Population 2026	25% headroom of 2026 projected population increase	Projected population 2026 including 25% headroom	Projected annual average population increase 2016-2026 excluding 25% headroom	Projected population 2027
128,884	139,000-144,500	2,529-3,904	141,529-148,404	1,562	149,966

Comments

2027 population projection calculated by adding the 2026 projected population (including 25% headroom) plus the annual average population increase 2016-2026 excluding the 25% headroom i.e. $148,404 + 1,562 = 149,966$

This calculation could be further clarified in section 2.5.3 of Chapter 2 'NPF Population Projections'.

Chief Executive's Recommendation: Insert additional text and table in section 2.5.3 of Chapter 2 (Additional text in red and deleted text in blue with a ~~strikethrough~~)

The NPF's Implementation Roadmap provides that Louth's projected population, in conjunction with the permitted 25% headroom, will be in the range of 141,500-~~148,404~~ ~~148,375~~ persons by 2026. Using the higher projected growth rate and factoring into the equation that this Plan runs from 2021 to 2027, the population projection for the County in 2027 is 149,966 persons, representing an increase in population of 21,082 on the 2016 Census figure (see Table 2.8). An annualised average of the projected population increase during the period 2016-2026 was used to calculate the projected population increase between 2026-2027. This figure of 1,562 persons was added on to the 2026 projection of 148,404 to give a projected population of 149,966 in 2027. These figures are set out in greater detail in Table 2.9.

Table 2.9: Population Projections in Louth 2016-2027

Population 2016	NPF Projected Population 2026	25% headroom of 2026 projected population increase	Projected population 2026 including 25% headroom	Projected annual average population increase 2016-2026 excluding 25% headroom	Projected population 2027
128,884	139,000-144,500	2,529-3,904	141,529-148,404	1,562	149,966

3. *The draft plan demonstrates a policy shift towards more focused growth in these higher tier settlements given the very low % growth experienced between 2011-2016 for the Drogheda (4.9%) and Dundalk (3.1%). It is considered prudent however, that the Council strengthens this policy shift in order to achieve the RSES target population of 50,000 for each of these Regional Growth Centres by 2031. Furthermore, it is highlighted that the projected growth rate of the southern environs of Drogheda to 2026 as expressed in the Draft Meath County Development Plan 2020 is 50%. Given this context and the requirements of significant rates of population growth in National Policy Objective 9 of the NPF, it is recommended that the Council consider the growth rate for the Regional Growth Centres of Drogheda and Dundalk and include an analysis and rationale of the proposed rates within the core strategy.*

Chief Executive's Response: The population target of 50,000 persons in 2031 as set out in the RSES was a key consideration in the development of a policy framework for the projected population increase in the Regional Growth Centres of Drogheda and Dundalk during the plan period.

In addition to the population target of 50,000 by 2031 consideration was also given to recent population growth in the settlements. The projected population annual average population increase for the settlements between 2016-2027 represents a 50% increase on the annual average population increase between 2002-2016.

It is considered that these projections are both ambitious and achievable and are consistent with national and regional policy of the growth and expansion of the Regional Growth Centres.

In addition, when the projected population for Drogheda and Dundalk is projected out to 2031 based on the rate of growth set out in the Draft Plan, it is apparent that the population projections are closely aligned with the 2031 population target as set out in the RSES.

Settlement	Population 2016	Projected population 2027	Population increase 2016-2027	Projected annual average population increase 2016-2027	Projected population 2031 based on average increase 2016-2027
Drogheda	34,199	41,113	6,914	629	43,629
Dundalk	39,004	46,664	7,660	696	49,448

When reviewing the figure for Drogheda consideration must be given to the fact that in 2016 the population of the Southern Environs of Drogheda was 6,757 persons. When this is added to the projected population in 2031 (without factoring in any additional growth in the Southern Environs) the projected population would be 50,386 persons.

It is noted that the EMRA submission indicated that the proposed population growth in the Southern Environs of Drogheda would be 50% of the 2016 population. In its submission to the Draft Meath County Development Plan Louth County Council queried the proposed growth rate in the Southern Environs in the context of the population target of 50,000 in the town by 2031.

In addition the section on the Drogheda Joint Local Area Plan on page 64 of the RSES states that the distribution of population should be generally in proportion to existing population levels in each local authority area. In 2016 the population of the Southern Environs of Drogheda was 16.5% of the total population in the town. It is clear that a 50% increase in population is significantly in excess of the proportion of the total population of Drogheda living in the Southern Environs.

Following a review of the population and housing allocation to the Self-Sustaining Growth Towns of Ardee and Dunleer as required by the OPR and EMRA there is additional population and housing that will be available for redistribution. Taking account of the designation of Drogheda and Dundalk as Regional Growth Centres it is appropriate that this population and housing allocation is redirected to these settlements.

Chief Executive's Recommendation – Redistribute the excess population and housing from Ardee and Dunleer to Drogheda and Dundalk – this is set out in the recommendation for item 4 below.

- 4.** *In order to ensure compliance with the requirements of the NPF and RSES, it is recommended that the Council provide a robust and clear rationale, in accordance with NPO 9 of the NPF, that outlines the suitability, or otherwise, of the growth rates for Ardee and Dunleer.*

Chief Executive's Response: The distribution of population and household growth in the County was evidence led, with an assessment of the capacity of each settlement to accommodate a sustainable level of growth during the lifetime of the Plan. This asset based assessment included an analysis of a range of criteria including:

- i) Position in the settlement hierarchy
- ii) Employment base
- iii) Connectivity
- iv) Services e.g. schools, community facilities etc.
- v) Infrastructure capacity e.g. roads and water services

Taking account of the high job: workforce ratio in Ardee (0.93) and Dunleer (1.10) in addition to the location, range of services and availability of land, and their designation as Self-Sustaining Growth Towns in the settlement hierarchy, it was considered that both settlements are well positioned to accommodate population and economic growth during the life of the Plan.

Whilst it is acknowledged that the proposed growth rates for Ardee and Dunleer exceeds 30% of the 2016 population, the level of growth must be viewed in the context of the distribution of growth within the County, whereby 7.9% (1,655 persons) of the total projected population growth in the County would take place in Ardee and 4.4% (935 persons) would take place in Dunleer. This level of growth was considered proportionate taking account of their position in the settlement hierarchy and capacity to accommodate growth on a sustainable platform.

Nonetheless, the requirements of NPO 9 are noted and the projected level of population growth in Ardee and Dunleer will be amended so they are less than 30% of the 2016 population for each of the settlements.

Chief Executive's Recommendation: Amend the projected population growth for Ardee and Dunleer to 29% of the 2016 population for each settlement.

Settlement	2016 Population	29% of 2016 Population	Projected Population 2027	% of Total Growth in the County
Ardee	4,928	1,429	6,357	6.8%
Dunleer	1,822	529	2,351	2.5%

The excess population and housing will be redistributed to the Regional Growth Centres of Drogheda and Dundalk. See the amended Core Strategy Table in Appendix 5 of this Report.

5. *It is recommended that the core strategy clearly define the function of strategic reserve lands in the narrative and their appropriate delivery beyond the 2027 plan period which should also be reflected in the zoning objective.*

Chief Executive's Response: The lands identified as strategic reserve in settlements are lands that were previously zoned for development and are part of the legacy of previous plans which had an excess of zoned lands. These lands will not be available for development during the lifetime of the Plan.

The guidance note for the land use zoning objective 'Strategic Reserve' in section 13.19.26 of the Development Management Guidelines in Chapter 13 that these lands will not be available for development until after the expiration of the Plan.

It is acknowledged that additional text could be provided in section 2.4.3 'Guiding Principles for Core Strategy' in relation to the Strategic Land Reserve.

Chief Executive's Recommendation: Insert additional text into section 2.4.3 'Guiding Principles for Core Strategy' in relation to the Strategic Land Reserve (Additional text in red and deleted text in blue with a ~~strikethrough~~)

With regard to any surplus of residential lands, ~~both the prioritisation and de-zoning of lands will be considered~~ the prioritisation of lands will be considered. This may include the phasing of lands and/or the introduction of a strategic reserve, or the de-zoning of land. Any lands placed in a strategic reserve will not be available for development during the lifetime of the Plan. ~~and~~ This will be dependent on the settlement category in which the lands are located and other localised factors including but not limited to; recent patterns of development, extant permissions, and infrastructure constraints.

6. There appears to be an error in the projected percentages of total growth rate 2021-2027 as stated under Section 2.5.4 where it states "69% of the projected targeted to Drogheda and Dundalk." The percentage targeted to Ardee and Dunleer is calculated to be 12.3% (not 8.7%) and the residual to be 18.5% (not 22%) based on the percentages presented in Column I of Table 2.9.

Chief Executive's Response: This is an error. Table 2.9 'Population Projections and Distribution by Settlement Category, County Louth' sets out the correct percentage of total growth allocated to each settlement during the plan period. Section 2.5.4 will be updated as per the revised population distribution proposed on foot of the recommended amendments to the growth rate in Ardee and Dunleer by the OPR and EMRA during the life of this Plan.

Chief Executive's Recommendation: Correct the percentage of total population growth to be allocated to the Regional Growth Centres, Self-Sustaining Growth Towns, and remainder of the County in **Section 2.5.4 Population Distribution**

With ~~69%~~ over 72% of the projected population targeted to Drogheda and Dundalk and 8.7% to Ardee and Dunleer, the residual ~~22%~~ 18.6% of the projected population will be allocated to the remaining settlements including Self Sustaining Towns, Towns and Villages and the Rural Area.

Compact Growth

7. *The title of Column K in the Core Strategy Table should be revised to “Units to be delivered on infill/brownfield lands” to avoid ambiguity.*

Chief Executive’s Response: Noted. Column K can be updated accordingly.

Chief Executive’s Recommendation: Update the title of Column K in the Core Strategy Table (Table 2.15) as follows (additional text in red):

Potential units to be delivered on infill/brownfield lands. See updated Core Strategy Table in Appendix 5 of this Report.

8. *In terms of Columns J and L of the Core Strategy Table which provide figures on the lands with potential to deliver infill/brownfield development and total zoned lands for residential, the Council is requested to clarify the particularly low figures for Drogheda (16%) and Dundalk (11%) and provide clarity/reasoning in the narrative regarding allocated units vis-à-vis total lands available.*

Chief Executive’s Response: Compact growth is development that takes place within and close to the existing built up footprint of settlements and consists of the redevelopment of vacant or under-utilised lands or the development of infill sites. As set out in section 2.6.6 ‘Compact Growth’ of Chapter 2 an analysis of the potential lands available to deliver infill and brownfield development in each settlement was carried out. These figures are set out in Column J of the Core Strategy Table. A calculation of the potential number of units that could be delivered on these lands is set out in Column K of the Core Strategy table.

As required under national and regional policy, this Plan promotes a sequential pattern of development that focuses on the creation of compact, sustainable settlements. It is acknowledged however, that there can be challenges in the development of infill and brownfield lands and dealing with various issues such as contaminated lands, access, and connection to/upgrade of services, which can increase the cost of servicing the lands and result in a longer timeframe in their development. The analysis of infill and brownfield lands identified that there is potential for in excess of 4,000 units to be delivered on infill and brownfield lands, which is approximately 50% of the total household allocation for the County during the plan period. It is acknowledged however that not all of these lands will be developed during the lifetime of this Plan, and it may take a number of development plan cycles for the lands to be developed. In addition some of the lands may be developed for uses other than housing such as commercial or employment generating uses.

Taking this into account, it is important that there is sufficient flexibility in the land use zoning strategy to ensure that there are sufficient lands available to meet the housing needs of the County during the life of the Plan.

It is also acknowledged that there are significant lands zoned for residential development in Drogheda and Dundalk, which is in excess of the land requirement to deliver the housing allocation for the settlements as set out in the Core Strategy. However these excess lands must be viewed in the context of the long term development strategy for these settlements. In order to ensure the residential needs of both the existing and projected additional population in these Regional Growth Centres can be met it is critical that there is flexibility in the residential lands available for development. Within both settlements there are significant parcels of undeveloped lands identified for residential use. It will take a considerable period of time, in some cases multiple development plan cycles for the lands to be built out however it is logical in terms of design, layout, connectivity, and infrastructure provision that the large parcels of residential lands are designed as a single development area. This can be carried out as part of a Master Plan which will also include detailed phasing for the build out of the lands which will allow the release of lands for development to be carefully managed in accordance with the Core Strategy and development plan requirements.

Given the extent of some of the parcels of land identified for residential development it will take a significant period of time to design and prepare a Master Plan, which could mean that it may be a number of years into the Development Plan cycle before a planning application is received on some of the parcels of land. It is for this reason and the desire to ensure that both Regional Growth Centres have the capacity to facilitate the residential requirements to meet the projected population growth without being constrained by lands not being released for development for various reasons that the extent of lands available has been identified for residential development.

In the Northern Environs of Drogheda there is a legacy of historic extant planning permissions for multi-unit developments that have not commenced. It is anticipated that a significant proportion of these permissions will not be implemented; however they will not expire for a number of years. Taking this into account it was considered prudent to retain the residential land use zoning in the Northern Environs of Drogheda and review it in greater detail as part of the Joint LAP. It must also be noted that there are significant infrastructure constraints on the development of these lands i.e. the delivery of the Drogheda PANCR and water services that is inhibiting the development of these lands. This has been identified in the Infrastructure and Land Use Evaluation in Appendix 2 of Volume 3 of the Draft Plan. Taking this into account it is considered that the residential land use zoning in North Drogheda should be retained and reviewed in greater detail as part of the Joint LAP.

This review will include details of the phasing of the development of the lands and will have the benefit of more information on the status of the PANCR and the water services capacity and investment requirements to facilitate development in this part of the town.

It is recognised however that further clarity is needed in the Plan as to how the residential lands will be built out and in this regard the introduction of phasing would provide further clarity on this issue.

This will only be a requirement in the Regional Growth Centres of Drogheda (which will be introduced following the preparation of the Joint LAP) and Dundalk and the Self-Sustaining Growth Towns of Ardee and Dunleer. In all other settlements the build out of residential lands can be appropriately managed through the Development Management process.

Chief Executive’s Recommendation: Introduce phasing arrangements for the release of residential lands for development in the Regional Growth Centres of Drogheda, Dundalk, Ardee, and Dunleer.

Insert the following additional text into section **2.6.6 Compact Growth**

In satisfying this target for compact growth, an analysis of appropriate brownfield and infill sites with potential capacity to deliver new homes was completed for Dundalk, Drogheda, Ardee and Dunleer and the remaining Level 3 settlements. **This compact growth will be delivered in central locations of these settlements and along key transport corridors on lands zoned for town centre, residential, or mixed uses.**

The proposed phasing of residential lands is set out in the proposed amendments to the zoning maps which can be viewed in Appendix 6 of this report.

Insert the following policy objective into the Core Strategy:

Policy Objective	
CS XX	To apply phasing to the delivery of new residential development as indicated on the zoning maps for the applicable settlements, whereby residential development, other than infill, brownfield or mixed use development will generally only be permitted on Phase 1 lands. Where lands zoned ‘New Residential Phase 1’ are not being brought forward for development in particular areas and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing during the lifetime of this Plan appropriately located ‘New Residential Phase 2’ lands, subject to the lands contributing to compact and consolidated patterns of development.

New Residential (A3) New Residential – Phase 2

Objective
To provide for new residential neighbourhoods and supporting community facilities.

Guidance

These are lands identified for residential uses that will only become available for development after 75% of the Phase 1 (A2) lands in the immediate vicinity of the phase 2 lands have been developed (as set out in policy objective CS *). The Planning Authority will monitor the lands zoned ‘New Residential Phase 1’ at regular intervals.

If it becomes apparent that there are lands zoned 'New Residential Phase 1' that are not being brought forward for development and this is impeding the achievement of Core Strategy projections and restricting the growth of the settlement as envisaged in national and regional policy, consideration may be given to releasing appropriately located 'New Residential Phase 2' lands, subject to the lands contributing to compact and consolidated patterns of development.

Core Strategy Objectives

9. A short statement could be included within Section 2.7 referring to the significance of the statutory cross boundary Joint Urban Area Plan (UAP) for Drogheda particularly having regards to the reference made around a necessary co-ordinated approach to infrastructure investment in these centres.

Chief Executive's Response: A statement referring to the Joint LAP for Drogheda and the LAP to be prepared for Dundalk could be inserted into section 2.7.

Chief Executive's Recommendation – Insert additional text into section 2.7 'Economic Development' of Chapter 2 referring to the Joint LAP for Drogheda and the LAP for Dundalk.

In accordance with the principles of the NPF and the RSES, and in recognition of the critical importance of the Dublin Belfast Economic Corridor, this Draft Plan promotes economic growth in those locations identified in the RSES capable of accommodating significant economic growth, primarily the RGC's of Drogheda and Dundalk. RGC's will serve as focal points to gain critical mass and deliver positive impacts to the surrounding area whilst enhancing overall Regional and National growth. A coordinated approach to infrastructure investment for the sustainable development and growth of the urban settlements and interconnections will be necessary to build greater levels of critical mass and facilitate the effective movement of people and goods.

The Joint LAP to be prepared for Drogheda with Meath County Council and the LAP to be prepared for Dundalk will provide greater detail on the policy framework for these settlements that will assist in co-ordinating infrastructure investment.

Joint LAP

10. In terms of consistency with the RSES it is recommended the Council amend all references to the UAP in the plan to "cross boundary statutory Joint Urban Area Plan (UAP)" in accordance with RPO 4.11 of the RSES.

Chief Executive's Response: Whilst the recommendation is noted there is currently no legislation in place regarding the preparation of Local Area Plans. National Policy Objective 70 of the NPF indicates that the provision for Local Area Plans will be based on current Local Area Plan provisions. Taking this into account it is considered appropriate to refer to the Joint Plan as a Joint LAP.

Chief Executive's Recommendation – No Change

Monitoring Residential Activity

11. *The Assembly welcomes Policy Objective HOU 6 as presented in the Housing Strategy which proposes to monitor and maintain a record of residential development in settlements designated under the Settlement Hierarchy. It is recommended that the Council also consider adding a reference to the monitoring of residential development permitted as single rural houses. This would be reflective of NPO 36 of the NPF.*

Chief Executive's Response: The Planning Authority currently monitors and maintains a record of all residential development permitted in settlements and the open countryside. This policy should be amended to reflect this current practice.

Chief Executive's Recommendation: Amend Policy HOU 6 to read as follows:

Policy Objective	
HOU 6	To monitor and maintain a record of residential development permitted in settlements designated under the Settlement Hierarchy and development permitted in rural nodes and the open countryside in accordance with forthcoming Departmental guidance around the establishment of a HNDA coordination and monitoring unit and related implementation of a centralised spatial database for Local Authority Housing.

Order or Priority

12. *It is recommended that to further reinforce clarity around compact growth and appropriate phasing of development that a specific core strategy objective be included indicating the intention of operating an order of priority for lands specifically referring to the longer term delivery of lands zoned as strategic reserve to be delivered beyond the current draft plan cycle.*

Chief Executive's Response: See response to item 8

Infrastructure Assessment and Land Use Evaluation

13. *It is recommended that a summary of the findings of the Infrastructure Assessment and Land Use Evaluation be set out in the core strategy and the subsequent tiering of zoned lands be indicated on the official zoning maps for each of the settlements.*

Chief Executive's Response: Whilst the merits of including a summary of the findings of the Infrastructure Assessment on the zoning maps is acknowledged, there are concerns that this would result in these maps becoming cluttered with excess information and therefore difficult to interpret. There is sufficient reference to the Land Use Evaluation and Infrastructure Assessment in Volume 1 to inform any person reading the Plan where further information can be provided.

Chief Executive's Recommendation: No Change

Dundalk

14. *As per RPO 4.21 reference to the Dublin-Belfast Corridor should be recognised and included in the policy objectives for Dundalk in Chapter 2.*

Chief Executive's Response: Policy Objective SS 19 could be amended to include a reference to the Dublin-Belfast Economic Corridor.

Chief Executive's Recommendation: Amend policy objective SS 19 as follows: (additional text in red)

Policy Objective	
SS 19	To support the role of Dundalk as a Regional Growth Centre and a driver of growth along the Dublin-Belfast Economic Corridor and in the border area and to facilitate the continued expansion and growth of the town based on the principles of balanced, sustainable development that enables the creation of employment, supports economic investment, and creates an attractive living and working environment.

15. *Consideration should be given to including a Strategic Policy Objective regarding the preparation of an Urban Area Plan for Dundalk.*

Chief Executive's Response: Policy objective CS 10 supports the preparation of a LAP for Dundalk. No change required.

Chief Executive's Recommendation: No Change

16. *Policy Objective SS24 should be amended to include a reference to the Dundalk Port/Harbour area as a key regeneration/opportunity site as per RPO 4.23 of the RSES and taking account of the proximity of these lands to the town centre.*

Chief Executive's Response: 4 regeneration sites (Carroll Village, Longwalk Shopping Centre, St. Nicholas Quarter, and the Port Harbour Area) and 2 Retail Opportunity Sites (Former Dunnes Stores on Park Street and Williamsons Mall) have been identified in the Draft Plan. Policy objective SS24 supports the redevelopment of all of these sites. Section 2.14.3 in Chapter 2 provides supporting text for the regeneration sites whilst section 1.6.2.2 of the Retail Strategy provides details and supporting information for the opportunity sites. It is not considered necessary to specifically refer to one particular regeneration site over another in a policy objective however additional text could be provided in section 2.14.3 regarding the regeneration of the port/harbour area of Dundalk.

Chief Executive's Recommendation: Amend section 2.14.3 as follows (additional text in red)
The existing harbour area of the town is another area of Dundalk that is presently under-utilised. Whilst part of the lands are used for port related activities, there is a large area of land currently vacant (c.1.6 hectares).

Taking account of the proximity of these lands to the town centre there is potential for these lands to be developed for a range of uses that would complement the town centre and revitalise this part of the Town. **RPO 4.23 of the RSES supports the regeneration of the harbour/port area in the town and recognises its potential as a location for economic development.**

Housing

17. *Section 3.13 of the Draft Plan refers to ‘placemaking’. This section would benefit from a reference to section 9.4 of the RSES ‘Healthy Placemaking’ and the associated guiding principles, which also cross over with Chapter 4 of the Draft Plan ‘Social and Community’.*

Chief Executive’s Response: A reference to ‘healthy placemaking’ in section 3.13.1 would emphasise the importance of urban design principles in creating attractive and healthy environments that can meet the needs of all citizens.

Chief Executive’s Recommendation: Insert the following additional text into section 13.3.1: (additional text in red)

The RSES sets out a series of Guiding Principles for ‘Healthy Placemaking’ which includes multi-functional open spaces, connectivity between schools, workplaces, and residential areas, and giving priority to walking and cycling. This Plan will seek to implement these Guiding Principles, which are set out in further detail in section 9.4 of the RSES.

18. *The section on rural housing would benefit from the inclusion of a specific policy objective on siting and design.*

Chief Executive’s Response: Whilst there is a specific section on the siting and design of rural dwellings in the Development Management Chapter of the Draft Plan (Chapter 13 section 13.9.38 ‘Housing in the Open Countryside’) it is recognised that additional policy objectives in section 3.17 of Chapter 3 ‘Housing in the Open Countryside’ would strengthen the policy context for the assessment of applications for rural dwellings whilst also improving the assimilation between Chapter 3 and Chapter 13. Taking this into account, it is proposed to insert the following additional policy objective into Chapter 3:

Policy Objective	
HOU XX	To manage the development of rural housing in the open countryside by requiring that any new or replacement dwelling is appropriately designed and located so it integrates into the local landscape and does not negatively impact or erode the rural character of the area in which it would be located.

Chief Executive's Recommendation: Insert the following policy objective into Chapter 3:

Policy Objective	
HOU XX	To manage the development of rural housing in the open countryside by requiring that any new or replacement dwelling is appropriately designed and located so it integrates into the local landscape and does not negatively impact or erode the rural character of the area in which it would be located.

19. Concerns were raised about 'backland' development being facilitated in rural areas as set out in section 13.9.43 as it is an inappropriate form of development and has the potential to give rise to significant environmental effects, as highlighted in the Strategic Environmental Assessment. It is recommended that the Council ensures this policy objective is consistent with RPO 4.80 and 4.81 of the RSES and NPO 19 of the NPF and the content of Circular Letter PL 2/2017 "Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans."

Chief Executive's Response: Section 13.9.43 'Backland Development' in the Development Management Chapter indicates that the Council is generally not in favour of development in the open countryside that would result in the creation of backland development. The reason for this is that it would introduce a piecemeal and scattered pattern of housing in rural areas, which would result in the further erosion of the character of rural areas and fragment agricultural lands.

Provision has been made for the consideration of applications for backland development where the application is on family owned lands, the lands have owned by the family for at least 15 years, and the land holding has an area of at least 1.5 hectares. Only one dwelling will be permitted per landowner. However it is recognised that by facilitating such a pattern of development there could be a negative impact on rural character and visual amenities of the surrounding landscape. It is therefore recommended that this provision is removed from section 13.9.43.

Chief Executive's Recommendation: Delete the following text from section 13.9.43 (deleted text in blue)

The Council will not generally favour proposals which involve development located to the rear of established buildings, located along a private lane off public roads and which introduce a piecemeal form of backland development. This type of development results in a scattered arrangement of housing or clustered to the rear of existing properties and often long laneways to reach the properties.

It is not respectful of the traditional settlement pattern, creates a built-up appearance thereby eroding the rural character and further fragmenting agricultural lands, reduces residential amenity standards and can have an impact on traffic safety. ~~Backland Development will only be considered in Rural Policy Zones 1 and 2 where the applicants' site has been owned by the family for at least 15 years and the landholding is at least 1.5 hectares. Only one dwelling will be permitted per landowner. Any backland development should be accompanied by a deed of right of way to the proposed dwelling and must not have a negative impact on traffic safety.~~

HNDA

20. *Given the HDNA undertaken, it is considered additional information could be provided within this chapter of the plan such as a clearly presented summary of the entire housing need in County Louth, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.*

Chief Executive's Response: The Housing Strategy and the HNDA included analysis of socio-economic data relating to incomes, demographics, and household sizes and tenure that has provided a strong evidence base for projecting the future demand for housing in the County. This analysis and strategy has been transposed into the policy framework of the Development Plan, which will seek to ensure there is sufficient housing to meet projected demand and sufficient land zoned to meet the needs of different households and all types of tenures.

It is not considered necessary to repeat the tables as set out in the Housing Strategy regarding projected housing requirement and tenure however it is acknowledged that additional narrative on this issue.

Chief Executive's Recommendation: Insert additional text in section 3.4 Housing Strategy (additional text in red)

National Policy Objective 37 of the National Planning Framework (NPF) requires each Local Authority to develop a Housing Need Demand Assessment (HNDA), which must underpin and support the preparation of housing strategies and all related housing policy outputs. A detailed analysis of socio-economic data was used to create a robust, evidence based baseline that informed the policy framework for household growth during the plan period.

It is anticipated that the HNDA carried out as part of the Housing Strategy in this Draft Plan will enhance how acute and unmet demand for housing is identified before it arises. It provides a robust assessment of regional and localised influences, such as population and migration in quantifying needs and demands. The analysis of the socio-economic data provided the baseline for projecting future household tenure and size during the lifetime of the Plan. Further details are set out in section 4.0 of the Housing Strategy 'Housing Need' (Volume 3 Appendix 3).

21. *In accordance with NPO 20 of the NPF a rationale for the housing allocation for rural areas should be set out in the Core Strategy.*

Chief Executive's Response: National Policy in providing for the development of rural housing is based on the following factors, as set out in National Policy Objective 19 of the NPF:

- i) A demonstrable economic or social need to live in a rural area;
- ii) Siting and design criteria as set out in statutory guidelines and plan;
- iii) The viability of smaller towns and rural settlements.

Taking account of these criteria it is extremely difficult to carry out a quantitative analysis that would assist in arriving at a figure for the projected demand for rural housing. This is particularly challenging in the absence of national guidelines on the preparation of a Housing Need Demand Assessment. In the absence of this data an analysis of population growth in the open countryside was carried out between 2002-2016 and a projection of future population growth up to 2027 based on these recent trends, with consideration also given to the emphasis in national and regional policy on the importance of the revitalisation of rural towns and villages in supporting the creation of sustainable rural communities in the future. Based on the foregoing, the household allocation for the open countryside as set out in the Core Strategy Table is considered reasonable.

Chief Executive's Recommendation: No Change

Economy and Employment

22. *The acknowledgement and support for the development of the Smart City Programme is welcomed. It is also recommended that specific policy objective and supporting narrative relating to Smart Specialisation is included.*

Chief Executive's Response: Additional text could be inserted to section 5.5.3 'Strategic Policy' of Chapter 5 that provides a narrative for Smart Specialisation. An additional policy objective could also be inserted relating to same.

Chief Executive's Recommendation: Insert the following additional text in section 5.5.3 (additional text in red)

The NPF and RSES set out the planning policy approach for economic development at a national and regional level. There is an emphasis on taking a plan led approach to economic development that focuses on building resilience in the economy, promoting collaboration, innovation, and entrepreneurship, enhancing connectivity and accessibility, and aligning infrastructure investment with settlements designated for growth.

The RSES seeks to support economic growth and job creation in the Region through the concept of smart specialisation. This is a European Strategy that seeks to boost economic growth by enabling Regions to identify and develop competitive advantages. It is a partnership approach that brings together local authorities, universities, business groups and organisations, and the general public.

The RSES has identified Drogheda and Dundalk as Regional Growth Centres and recognises the significant potential of these settlements to function as drivers for economic development in the Region.

Policy Objective

EE XX	To support the implementation of the concept of 'smart specialisation' as part of the Economic Strategy for Louth.
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Ports

- 23.** *It is recommended reference is made to RPO 8.23 which supports the protection of marine related functions of the ports in the Region while also pointing to the potential opportunities around offshore renewable energy development.*

Chief Executive's Response: Additional text could be included in section 5.10 of Chapter 5 'Marine Opportunities Including Ports' referring to Regional Policy Objective 8.23 in the RSES.

Chief Executive's Recommendation: Insert the following additional text in Section 5.10 (additional text in red)

Ports have an important role in enabling economic growth and providing international connectivity. This is recognised in the RSES, which identifies regional ports as important centres of economic activity. Regional Policy Objective 8.23 of the RSES supports the protection of marine related functions of the ports in the Region while also pointing to the potential opportunities around offshore renewable energy development.

Tourism

- 24.** *Section 6.3.1 on Greenways could be strengthened by cross-referencing the information in Chapters 7 and 8 relating to same.*

Chief Executive's Response: There is a specific section on Greenways in Chapter 6 Tourism (Section 6.3.1) and Chapter 7 Movement (Section 7.5.11 Greenways). There is no specific section on Greenways in Chapter 8.

Additional text cross-referencing the sections on Greenways would make the Plan more user-friendly.

Chief Executive's Recommendation: Insert the following: (additional text in red)

At the end of section 6.3.1.2 insert 'Further information on Greenways can be found in section 7.5.11 of Chapter 7.'

At the end of section 7.5.11 insert 'Further information on Greenways can be found in section 6.3.1.2 of Chapter 6.'

Movement

- 25.** *Section 7.4 of the Movement Chapter would benefit from a reference to the Guiding Principles set out in Chapter 8 of the RSES that provides the basis for the integration of land use and transport planning in land use plans. Reference should also be made to RPO 8.1 in policy objective MOV 2.*

Chief Executive's Response: Section 7.4 of the Draft Plan includes a reference that national and regional policy recognises the benefits of integrated land use and transportation planning however a further reference to the Guiding Principles for the Integration of Land Use and Transport can be included.

There would be no objections to the inclusion of a reference to RPO 8.1 in policy objective 8.1.

Chief Executive's Recommendation: Include the additional text in section 7.4 (additional text in red)

National and Regional Policy recognises the benefits that integrated land use and transportation planning can offer, in improving accessibility and connectivity within neighbourhoods and urban areas, increasing economic productivity and facilitating balanced and healthy lifestyles. These benefits are closely aligned to the compact growth and urban regeneration policies in the NPF and RSES and can be delivered by promoting higher density developments, particularly along public transport corridors; improving connectivity and prioritising walking and cycling within and between neighbourhoods; and supporting mixed use neighbourhoods where there are employment opportunities and community facilities close to where people live.

Chapter 8 of the RSES 'Connectivity' provides a set of Guiding Principles for the Integration of Land Use and Transport. The 'Guiding Principles' applicable to Louth have formed the basis of the Integrated Land Use and Transport Strategy for this Plan.

Insert the additional text in MOV 2 (additional text in red):

Policy Objective

MOV 2	To facilitate the integration of land use with sustainable transportation infrastructure in accordance with the requirements of RPO 8.1 in the RSES by supporting the creation of a critical mass of population and employment related development that would maximise investment in public transport infrastructure and create compact, sustainable settlements.
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26. To ensure consistency it is considered that recognition of the EU TEN-T network as set out in RPO 8.11 of the RSES is referenced in the Plan.

Chief Executive's Response: It is acknowledged that the M1 Dublin-Belfast Corridor forms part of the EU TEN-T Core Network, which is a planned set of transport networks across Europe. Additional text can be inserted into the Development Plan referring to same.

Chief Executive's Recommendation: Insert the following additional text into section 1.5 'A Positive Outlook' (additional text in red)

As a result of this extended period of flux with economic highs and lows and subsequent volatilities, Louth, like the rest of the Country has had to adapt and adjust to the changes experienced and future proof for those changes yet to materialise. But Louth is a resilient County, and whilst there will be challenges to be faced, there will conversely be opportunities available from which the County can benefit and grow. Located along the border with excellent connectivity to Dublin and Belfast via the M1 Motorway, which forms part of the EU TEN-T Core Network and the inter-city rail link, Louth is an attractive location for UK business that requires access to the EU market and simultaneously Irish, European and International business requiring access to the UK market.

5.7 DUBLIN-BELFAST ECONOMIC CORRIDOR

Louth is strategically located between the two largest cities on the island, Dublin and Belfast. The excellent connectivity between the cities via the high capacity road [link \(M1 Motorway\)](#), which forms part of the EU TEN-T Core Network, the ~~and~~ inter-city rail link, in addition to the international links via the ports and airports, has created significant opportunities for economic investment and job creation.

Insert the following additional text into section 7.7.1 (additional text in red)

The M1 Motorway, which travels through Louth, is a strategically important road link that connects Dublin and Belfast. The M1 intersects with the M50 orbital motorway, which connects the national primary routes which radiate from the M50 to all parts of the country. The M1 forms part of the EU TEN-T Core Network and is an important strategic link within and through the county and region, including providing critical international connectivity and regional accessibility.

Insert the following additional policy objective after MOV 35:

Policy Objective	
MOV XX	Support the improvement, and protection of the EU TEN-T network and the strategic function of the Dublin to Belfast road network.

Natural Heritage, Biodiversity and Green Infrastructure

27. *The chapter would benefit from a cross reference to the overall importance of the ecosystem services approach and the strategic objective be reaffirmed within this chapter of the plan for consistency.*

Chief Executive's Response: The Council supports the proposal for facilitating cross reference in Chapter 8 of the Draft Plan with Section 1.7.5.1 Ecosystems Services Approach detailed in Chapter 1 and in Strategic Policy Objective SO6. It is therefore recommended that the following additional text be included in Chapter 8, Section 8.1.

Chief Executive's Recommendation: Insert the following additional text into section 8.1 of Chapter 8 as follows:

'In preparing the Draft plan and developing policy objectives the Council followed the principles of the Ecosystem Services Approach, to deliver sustainable and ecologically sound outcomes. Details of this approach are provided in Section 1.7.5.1 of the Draft Plan and supported in Strategic Objective SO 6, which seeks to conserve and enhance the County's Green Infrastructure and ecosystem services supporting the sustainable management of natural assets and the biodiversity of the County's protected habitats and species to provide a wide range of environmental, social and economic benefits to communities'

Built Heritage and Culture

28. *In finalising this Chapter, the Council should consult with Section 9.7 of the Draft Plan. It is considered that the policies and objectives of the Draft Plan are in keeping with same, including for instance, dealing with UNESCO World Heritage Sites such as Brú Na Bóinne as outlined in policy objectives BHC 9, 10, 11, 12, 13, 14 aligning with RPOs 4.15 and 9.29 of the RSES.*

Chief Executive's Response: Support for the standalone Chapter 9 'Built Heritage and Culture' is both noted and welcomed as is support for the policy objectives contained therein. Regarding consultation with Section 9.7 of the RSES it is the opinion of the Council that the both the narrative and policy objectives fully support Section 9.7 of the RSES achieved not solely in this Chapter 9 of the Draft Plan but also in Chapter 4 'Social and Community' and Chapter 6 'Tourism' of the Draft Plan. Notwithstanding this it is suggested that the additional text be included in Chapter 9, Section 9.1.

Chief Executive's Recommendation: Insert the following additional text into Chapter 4, Section 4.8 and Chapter 9, Section 9.1:

'The importance of the Built and Cultural Heritage and access thereto is acknowledged and supported in the RSES and the associated Regional Policy Objectives. The Draft Plan in the formulation of its Policy Objectives has been in accordance with the RSES

And the following text be included in Chapter 4, Section 4.8 to read as follows:

'The importance of Arts and Culture and access thereto is acknowledged and supported in the RSES and the associated Regional Policy Objectives. The Draft plan in the formulation of its Policy Objectives has been in accordance with the RSES.

Utilities

29. *In the use of SuDS detailed measures should also be incorporated into the forthcoming local area plans with a focus on enhancing biodiversity, amenity and the protection of environmentally sensitive sites, in accordance with RPO 7.15 of the RSES.*

Chief Executive's Response: Chapter 10, Section 10.2.5 recognises that in addition to forming part of the County's drainage infrastructure, SuDS can also provide amenity benefits to local communities and benefits for biodiversity simultaneously and that properly designed and located SuDS features can be incorporated within and complement the amenity and aesthetic value of open space. With regards to SuDS and proposals for detailed measures to be specifically incorporated into forthcoming Local Area Plans in accordance with RPO 7.15 of the RSES, the Council proposes that additional text be included in Chapter 10, Section 10.2.5.

Chief Executive's Recommendation: Insert the following additional text into Chapter 10, Section 10.2.5:

'Detailed measures in relation to SuDS techniques in all forthcoming Local Area Plans shall be appropriately designed to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measure are planned.'

30. *The attention of the Council is brought to RPO 7.43 advising local authorities to consider the identification of all Critical Infrastructure (CI) within their functional areas, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'futureproofing' services and to help to inform longer term adaptation planning and investment priorities.*

Chief Executive's Response: In relation to Critical Infrastructure, the Council acknowledges RPO 7.43, where CARO and Local Authorities should consider identifying critical infrastructure within their functional areas as a first step in future proofing services and to help to inform longer-term adaptation planning and investment priorities. In support of this is it suggested that additional text be attached to Strategic Objective SO 4.

Chief Executive's Recommendation: Insert the following additional text into Strategic Objective SO 4:

'Transition to a low carbon and climate resilient County supporting energy efficiency and reducing energy demand, through a combination of mitigation and adaptation responses to climate change. This includes for increased usage of renewable energy through developing indigenous energy resources, supporting the transition to a low carbon economy by 2050, and ensuring flood risk management. **The Council will work with other bodies and organisations as appropriate, to identify and help protect critical infrastructure.'**

31. *Prior to the finalisation of the Draft Plan including all related policy and objectives, it is recommended that the Council have regard to the provisions of the Wind Energy Development Guidelines 2006, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and the Draft Revised Wind Energy Guidelines published in December 2019, which are expected to be finalised in the near future.*

Chief Executive's Response: See Response to the OPR Submission (Submission No.817) and ESB Submission (Submission No. 614)

Chief Executive's Recommendation: See Recommendations in OPR Submission (Submission No.817) and ESB Submission (Submission No. 614)

Environment, Natural Resources, and the Coast

32. *It is recommended that the Council make a cross over reference to the Draft National Marine Planning Framework in this chapter as per Section 5.10 on marine opportunities.*

Chief Executive's Response: The Draft National Marine Planning Framework is referenced in both Chapter 11 and Chapter 5. It is specifically addressed within Section 5.10 in the context of Marine Opportunities Including Ports. A cross reference should be inserted within the text of Section 11.5.2 to bring attention to this.

Chief Executive's Recommendation: Insert additional text within the second paragraph of Section 11.5.2 - Changing Coast & Coastal Protection (additional text in red);

The present planning process is quite convoluted and requires permissions from a number of different bodies. Much of the marine planning reform is being driven by the European Maritime Spatial Planning Directive (Directive 2014/89/EU) which sets March 2021 as the date by which member states must have in place a Marine Spatial Plan (MSP). As per Section 5.10 of this Plan, following the preparation of the Marine Spatial Plan the Council will ensure that there is alignment and consistency between land use and ocean based planning.

33. *In terms of coastal resilience, the attention of the Council is drawn to Integrated Coastal Zone Management (ICZM) supported by RPO 7.3 of the RSES, as a coherent policy for the sustainable management of all aspects of the coastal zone.*

Chief Executive's Response: Integrated Coastal Management is acknowledged as an important mechanism for the integrated management of all policy processes affecting the coastal zone. It is considered that specific text and a policy objective should be included within Chapter 11 in support of RPO 7.3.

Chief Executive's Recommendation: Insert additional text immediately after Section 11.5.2 (additional text in red)

11.5.2.1 - Integrated Coastal Zone Management (ICZM) provides a tool for the integrated management of all policy processes affecting the coastal zone, addressing the land-sea interactions of coastal activities in a coordinated way with a view to ensuring the sustainable development of coastal and marine areas. ICZM will address issues such as coastal tourism development, the fishing industry, coastal settlement patterns, transport, coastal erosion, habitat destruction, protection of coastal zone SACs and SPAs and prevention of pollution.

Climate Action

34. *The chapter provides a very comprehensive overview of international legislation, national, regional and local policy context including reference to the 6 Regional Strategic Outcomes related to the key principle of Climate Action as set out in the RSES. In addition to the RSOs the Council acknowledges 5 RPOs for local level climate change policies to be consistent with, however it is not clear which particular RPO's the Council is referring to and it is requested that these are clarified for consistency and alignment with the RSES. It is considered that there a number of relevant RPOs relevant to Climate Action including RPOs 3.6, 3.7 and those contained at Chapter 7 of the RSES, which may assist the Council.*

Chief Executive's Response: The final section of Section 12.5.11 - Regional Spatial and Economic Strategy (RSES) – Eastern and Midlands Regional Assembly (EMRA) refers to 5 RPOs for local level climate change policies. In the interests of clarity it is considered appropriate to alter this text and specifically list the 5 RPOs.

Chief Executive's Recommendation: Amend text within the final sentence of Section 12.5.11 (Additional text in red and deleted text in blue with a strikethrough)

The RSES also sets out 5 specific Climate Change RPOs for the Eastern and Midlands Region ~~local level climate change policies to be consistent with~~ (RPO 7.30 – RPO 7.34).

35. *Section 12.7.1 of the Draft Plan indicates that the Strategic Environmental Assessment (SEA) includes an analysis of the impact of land use zoning on carbon reduction targets. The SEA has considered the impact of alternative land use zonings on carbon reduction targets, however the environmental report's analysis and overall conclusion on carbon reduction is in the form of a generalised statement. Consideration should be given to the inclusion of specific figures in relation to the reduction of carbon.*

Chief Executive's Response: As noted in the submission the SEA accompanying the Draft Plan has considered the impact of alternative land use zonings on carbon reduction targets, in the form of a generalised statement. In the interest of clarity, it is considered that the reference to an analysis of impact of land use zoning on carbon reduction targets should be deleted.

Chief Executive's Recommendation: Amend text within paragraph three of Section 12.7.1 - Climate Change Mitigation;

The Strategic Environmental Assessment (SEA) in Volume 5 of this Draft Plan appraises the likely significant environmental effects of this Draft Plan and the reasonable alternatives considered. ~~This assessment includes an analysis of impact of land use zoning on carbon reduction targets.~~

36. *The attention of the Council is brought to the Climate Action Fund made available under the Department of Communications, Climate Action and Environment, and, in order to be availed of, requires policy support. In this regard, the Council may wish to identify potential projects as part of the finalised Plan.*

Chief Executive's Response: The Climate Action Fund is referenced in Section 12.5.10 of the plan. It is considered appropriate that an additional policy objective is inserted with regard to availing of funding.

Chief Executive's Recommendation: Insert additional policy objective within Section 12.6 with regards to the Climate Action Fund.

Policy Objective

CA 8	To seek to identify projects or initiatives that will assist in meeting national climate and energy targets and to seek funding or support any funding applications for the implementation of these initiatives from available sources including the Department of Communications, Climate Action & Environment's Climate Action Fund
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SEA, AA, and SFRA

37. *The Assembly note Section 8.4 of the SEA which refers the inclusion of 3 no. Members motions (Table 8.3) as part of the Environmental Report, which details motions that were advised against inclusion in the Draft Plan. The Assembly request that a clear rationale be provided for the inclusion of same as part of the finalised Plan, and to omit these where there is potential for significant negative environmental effects.*

Chief Executive's Response: These motions related to the re-zoning of a parcel of land in Dundalk, additional qualifying criteria for persons living in Rural Policy Zone 1, and exceptions to facilitating 'backland' development in rural areas. Each motion will be addressed individually below.

Re-Zoning of lands in Dundalk

This related to the re-zoning of 4.1 acres of land at Dundalk Racecourse from Tourism and Leisure to 'A2 New Residential' to facilitate the development of a retirement village. The Executive did not recommend this motion was carried as it was not considered to be a suitable location for a retirement village due to the lack of any services or amenities in the vicinity of the site that any residents of a retirement village could avail of. This would result in the development being dependent on private transport to travel to and from the town centre to access any retail, community, or social services. In addition the Executive considered that there were other more suitable locations closer to the town centre for a retirement village and therefore it did not pass the sequential test for such a development.

Additional Qualifying Criteria for persons living in Rural Policy Zone 1

This motion facilitated the inclusion of criteria number 2 in Table 3.4 of the Draft Plan, which facilitated 2no. dwellings in addition to the family home for a son or daughter of a landowner who have a landholding of at least 3 hectares and has owned the land for a minimum of 10 years.

Given the pressure the open countryside is under for development, in addition to the landscape, cultural, and environmental sensitivities in Rural Policy Zone 1, there were concerns that this additional criteria would place further pressure on this sensitive landscape. However it is acknowledged that a balance needs to be made between facilitating persons with strong ties to the rural area and preserving the local landscape. Further details on the response to issues raised regarding the rural housing policy can be found in the section of this Report 'Rural Policy General – Composite Response'.

Exemption to facilitate backland development in rural areas in certain circumstances

This motion enabled applications for backland development in rural areas to be considered in Rural Policy Zones 1 and 2 where the applicants' site has been in family ownership for at least 15 years and the landholding is at least 1.5 hectares. The nature of backland development is such that it could have a negative impact on rural character and the visual amenities of the local landscape.

It is also noted that the size of the landholding on which backland development can be considered is smaller than the minimum size of a landholding for the son or daughter of a landowner applying under criteria 2 in Rural Policy Zone 1, which is 3 hectares. This could create confusion in the application and interpretation of the policy.

It is recommended that this provision is removed from section 13.9.43.

Chief Executive's Recommendation: Remove the A2 'New Residential' zoning in Dundalk associated with Spot Objective 3 and change this land use zoning to I1 'Tourism and Leisure'. The Spot Objective on these lands shall also be removed.

Section 13.9.43 Backland Development should be amended so as to delete the last paragraph of that section providing an exemption to where backland development would be permissible.

SFRA

38. *The Assembly emphasise that the Council follow the provisions outlined under RPOs 7.12, 7.13 and 7.14 relating to the support of Flood Risk Measures identified in the CFRAM Flood Risk Management Plans, the sequential approach to development set out in the 2009 Department Guidelines on Planning and Flood Risk Management and the inclusion of Sustainable Drainage Systems (SuDS). In particular the Council are directed to the recommendations set out in the SFRA relating to Flood Risk Management for Drogheda and Dundalk and the potential for joint studies for e.g. in the case of the cross boundary statutory UAP for Drogheda between Louth and Meath County Councils.*

Chief Executive's Response: Refer to response to OPW submission no.629.

Chief Executive's Recommendation: See Response to OPW submission 629

Other

39. *It is considered that the final plan would benefit from general cross referencing across the chapters and specifically in the areas as indicated in the submission.*

Chief Executive's Response: The benefits of cross-referencing in the Plan are acknowledged. The Council will endeavour to include cross-referencing where possible.

Chief Executive's Recommendation: Endeavour to identify and cross-reference common themes as they arise in the Plan.

Submission No.	LCDP DR203
Submitted by:	Transport Infrastructure Ireland (TII)

Summary of Submission

1. There is insufficient reference to the strategic importance of the TEN-T network and strategic function of the Dublin to Belfast road network and the need to protect this road from unnecessary development and sprawl. This is particularly apparent in sections 5.7 and 5.11.1 and policy objectives such as S01, SS1, and SS2.
2. Access to National Roads – Whilst section 7.7.2 relating to National Roads is welcomed, it is recommended that the wording of policy objective MOV 35 is amended to reflect Section 2.7 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Road Guidelines for Planning Authorities’ (DoECLG, 2012).
The following additional text (highlighted and in bold) is proposed to be inserted into policy objective MOV 35:
“To protect the strategic transport function of national roads, including motorways and associated junctions through the implementation of the ‘Spatial Planning and National Roads – Guidelines for Planning Authorities’”
It is also recommended MOV 46 is amended as follows (strikethrough through deleted text and additional text highlighted and in bold):
”To safeguard the capacity and safety of the National and Regional Road network by ~~restricting further~~ **avoiding the creation of any additional access point from new development or the generation of increased traffic from existing** accesses onto National Primary, National Secondary, and Protected Regional Roads in accordance with the details set out in Tables 7.5 and 7.6.”
3. Various potential developments set out in section 3.17 (Housing in the Open Countryside), section 5.19 (Rural Economy), and energy related developments in Chapters 10 and 13 are unclear with regard to policy relating to the national road network. Further clarity should be provided to assist applicants or developers.
4. Exemptions - Table 7.5 includes 4 categories of development that may be subject to a less restrictive approach to the control of development accessing national roads. TII advises that no agreements exist in relation to these exemptions and considers this approach inappropriate and in conflict with the provisions of the Section 28 Ministerial Guidelines relating to Spatial Planning and National Roads Guidelines for Planning Authorities. TII strongly recommends that this element of the Draft Plan is reviewed and the proposals in conflict with the Section 28 Ministerial Guidelines be omitted.
5. Local Area Planning – TII would welcome consultation on the future Local Area Plans and Local Transport Plans for Drogheda and Dundalk and the Local Area Plans for Ardee and Dunleer.

TII considers the Local Transport Plans should be prepared in advance of the land use plans. In the preparation of land use plans particular care should be taken in the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. In such instances, appropriate consultation should occur with TII.

6. Master Plans – The Plan includes a number of Master Plans located in proximity to the national roads network which were prepared prior to the publication of the Section 28 Ministerial Guidelines relating to Spatial Planning and National Roads Guidelines and many other statutory planning guidelines . The ones of concern are as follows:
- i) Drogheda Northern Environs Masterplan (2006)
 - ii) Mullagharlin Framework Plan (2008)
 - iii) Northeast Ardee Masterplan Area (2008)

TII is of the opinion that these Master plans do not reflect the changing circumstances and policies which have occurred in the intervening period and could materially impact national roads.

The Drogheda Northern Environs Master Plan refers to lands zoned for tourism and leisure uses to the west of Junction 10 on the M1 that is not zoned in the Draft Plan.

The following policy objectives also refer to the preparation of Framework Plans which could materially impact national roads:

- EE 35 – Employment lands in the Northern Environs of Drogheda
- EE 60 – An Economic Business Zone at Carrickarnon
- SS 33 – The delivery of the Northern Environs Framework Plan in Dundalk

The primary issue raised is that these Master Plans will be non-statutory and TII will not be consulted when they are being prepared. TII consider this approach to be wholly inappropriate and may lead to substantial risks for future development.

The primary issue, in this regard, relates to the absence of appropriate statutory planned evidence-based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that may have significant implications for the strategic national road network in the area concerned. The Authority considers that such issues can be addressed with collaboration and should be addressed in advance of adoption of the County Development Plan, 2021 – 2027.

7. Retailing – Reference should be made in section 13.12.5 to section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines which sets out the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions.
8. Rural Development – As previously indicated TII would welcome the inclusion, as advice to potential applicants in rural areas, the requirement to adhere to the provisions of official policy in relation to development accessing national roads.
An appropriate cross reference with policy objectives MOV 35 and 46 in sections 3.17 and 5.19 and Chapters 10 and 13 should be included.
9. Signage – Consideration should be given to including a reference to section 3.8 of the Spatial Planning and National Roads Guidelines and the TII Policy on the Provision of Tourism and Leisure Signage on National Roads (2011) in section 7.10 and Chapter 13.
10. Transport Planning and National Road Schemes – TII is very concerned with regard to wording highlighted which is problematic for the protection of the N2 NDP scheme in MOV 40 i.e. the N2 upgrade Ardee to Castleblayney. Pending the identification of a preferred route corridor, it is critical that Route Corridor Options are safeguarded free from development.

It is requested MOV 40 is amended as follows (additional text underlined and deleted text in blue with a strikethrough)“To support the progression of the long term upgrade of the N2; and in particular to protect the selected route potential route corridors and thereafter the preferred route corridor of the upgrade road scheme between Ardee and Castleblayney, and prohibit development that could prejudice its future delivery; and to continue to work closely with Transport Infrastructure Ireland, Monaghan County Council, property owners, and residents affected, and other stakeholders in the delivery of this project.”

- 11. Ancillary Policy Provisions and Issues** – TII would welcome the inclusion of the following policy objective relating to surface water drainage on national roads:

‘The capacity and efficiency of the national road network drainage regimes in County Louth will be safeguarded for national road drainage purposes’.

- 12. Renewable Energy and Grid Connection** – For Solar PV development proposals, a glint and glare assessment will be required by TII to assess the impacts on National Roads.

It is also recommended an assessment of grid connections. When alternatives are available it is considered inappropriate to use the national road network. TII would welcome the inclusion of an objective indicating that it should be demonstrated that an assessment of all alternative grid connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the national road network.

- 13. TII Publications** – In relation Section 7.3.2, TII advises that Design Manual for Roads and Bridges (DMRB) has been subsumed into TII publications.

- 14. TII Publications** – Reference should be made to the TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ with regard to the application of DMURS. TII requests that the Draft Plan acknowledges that TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ (TII Publications DN-GEO-03084) will be applied in combination with DMURS principles on national roads in urban areas.

15.

Chief Executive’s Response:

- 1.** It is acknowledged that the M1 Dublin-Belfast Corridor forms part of the EU TEN-T Core Network, which is a planned set of transport networks across Europe. Whilst the Plan recognises the strategic function and importance of the M1 Motorway in providing national and regional connectivity between key designated centres of growth on the island of Ireland, additional text can be inserted in sections 1.5, 5.7 and 7.7.1 referring to the TEN-T network. An additional policy objective can also be inserted into the Movement Chapter. These are set out in the Chief Executive’s recommendation.

Policy Objectives SO1, SS1, and SS2 refer to the Dublin-Belfast Economic Corridor. This is a much broader area than the Dublin-Belfast Road Network as it refers to the cities and towns along the corridor in addition to the services and infrastructure that connects them. Taking this into account it is not considered necessary to reference the TEN-T network in these policy objectives.

Section 5.11.1 provides a narrative on the Regional Growth Centres of Drogheda and Dundalk. It is not considered necessary to refer to the EU TEN-T Core Network in this section of the Plan.

2. The Draft Plan recognises the importance of safeguarding the National Road network. It is considered that this appropriately reflected in policy objective MOV 35.

The economic importance that the connectivity the national road network and in particular the motorway network provides is also recognised. In this regard it is important that a balance is achieved in protecting junctions onto the national road network, in particular motorway interchanges, but also recognising that there are lands zoned for employment related uses in proximity to the motorway interchanges in Drogheda (Junction 10 Drogheda North) and Dundalk (Junction 16 Dundalk South Interchange, Junction 17 Castleblayney Road and Junction 18 Ballymascanlon) and that the development of these lands will have an important role to play in supporting and facilitating future economic and employment related development in these Regional Growth Centres. In this regard it is considered that such development should be supported. However any development at rural related motorway interchanges should be resisted.

Additional text and associated policy objectives will be included in Chapter 7 'Movement' providing additional detail regarding development at motorway interchanges.

3. The Development Management Guidelines in Chapter 13 set out standards and guidelines that will be applied in the assessment of planning applications. This includes residential, employment, and energy related developments. The section on housing in the open countryside includes a specific section on Access (section 13.9.51) which indicates that "a list of National and Protected Regional Roads where no new accesses or intensification of existing accesses are permitted is set out in Table 7.5 and 7.6 of the Movement Chapter. There is a specific policy objective (HOU 46) requiring applications for one off rural housing to comply with the standards and criteria for rural housing set out in Chapter 13.

With regard to employment related development in rural areas section 13.11.11.1 requires any application for employment related development to include an assessment of traffic movements and its potential impact on the local road network to be included in any application. This could be extended to make a specific reference to the national and regional road network.

There is also a specific section in Chapter 13 on Transport (Section 13.14), which includes a sub-section on national and regional roads (section 13.14.5.1) which refers the reader to the restrictions on accesses to national and regional roads in section 7.9 of the Movement Chapter.

In order to provide further clarity additional text could be included in the narrative of section 5.19 (Rural Economy), section 13.11.11.1 (Employment Development in the Open Countryside), section 13.16.1 (Wind Energy), and 13.16.2 (Solar Energy). Additional wording is set out in the Chief Executive's recommendation.

4. It is assumed that the issue raised is in reference to the exemptions included in Table 7.5 regarding access on to National Roads. With regard to these exemptions they would only be applied in exceptional circumstances where TII have been consulted beforehand.

The Council is committed to safeguarding the national road network and in this regard considers it sensible and logical to include a provision for a new access on to a national road where a traffic hazard can be eliminated. Indeed there have been recent applications granted by the Council and supported by TII for such developments.

The inclusion of the exemption relating to the extension of an authorised use subject to it not creating a traffic hazard will require a consultation with TII. As previously indicated taking account of the fact that the Council is committed to safeguarding the national road network such a development would only be facilitated where it is demonstrated the development would not create a traffic hazard or undermine the capacity or safety of the national road network.

Any proposal for a major employment generating development or a development of national or regional importance that would require a new access on to a national road would only be considered in exceptional circumstances where there is a locational specific reason for the development to be accessed off a national road. Again, this would require prior consultation with TII.

The final exemption refers to an access to a fixed natural resource of national or regional importance. The provision of such an access would only be facilitated in exceptional circumstances, with a consultation with TII required. The intention of these exemptions is to provide clarity for situations when an access on to a national road may be considered. As previously indicated the Council is committed to safeguarding the capacity and safety of the national roads that travel through Louth and the Council has engaged with and worked closely with the TII in eliminating traffic hazards along the national roads in Louth.

Any application submitted under these exemptions will be assessed taking account of the potential impacts on the capacity and safety on the national road network and a decision will be made in consultation with TII.

5. As part of the process of preparing Local Area Plans the Council will engage with all prescribed authorities, including TII. The Local Transport Plans are to be prepared in consultation with the National Transport Authority. Where required, TII can also be consulted.
6. The purpose of a Master Plan is to provide a vision and conceptual guide for the long term development of a large and/or strategically located area of land, where there is a co-ordinated framework for the planning, phasing, and construction of the lands. The areas for which Master Plans have been prepared or are proposed to be prepared have been zoned for a particular land use under the Draft Plan.

Therefore the principle of a particular use will be established at the development plan stage with the Master Plan providing an opportunity to take a more detailed analysis of the development of the lands including layout, density/plot ratio, access, infrastructure investment, and phasing in order to ensure there is a co-ordinated vision and approach to the build out of the lands. The Forward Planning section does not have the resources to prepare these Master Plans and therefore the developer(s) or landowner(s) prepare these Master Plans in consultation with the Council.

Existing Master Plans/Framework Plans

Whilst it is acknowledged the Mullagharlin (2008) Framework Plan, and Drogheda Northern Environs (2006) and Ardee North-East (2008) Master Plans were prepared over 10 years ago it is considered that the principles of the Framework and Master Plans remain consistent with national and regional policy. They consist of strategically located parcels of land that are fundamental to facilitating the future economic and population growth of the County.

The Master Plan for the Northern Environs of Drogheda relates to the residential area of the Northern Environs. It does not relate to any lands west of Junction 10 of the M1. The 2004 Local Area Plan for Drogheda included lands west of Junction 10 of the M1 however the Master Plan relates to the residential neighbourhoods in the plan area.

Policy Objectives for Framework Plan and Master Plans

Policy Objective SS 33 refers to the delivery of the Northern Environs Framework Plan for Dundalk. It was an objective of the 2009 Development Plan for Dundalk to prepare this Framework Plan however it has not been prepared to date. The preparation of this Framework Plan will be dependent on resources and work programmes within Forward Planning. It will not be prepared prior to the LAP for Dundalk.

Policy Objective EE 35 refers to undeveloped employment lands in the north Drogheda area. The purpose of a Master Plan on these lands will be to provide a conceptual layout for any business or enterprise development on the lands in addition to providing clarity on the access and service arrangements.

7. Section 2.8 of the Spatial Planning and National Roads Guidelines indicates that planning authorities may consider policies for off-line motorway service areas and that the proliferation of private off-line service area facilities at national road junctions should be avoided. No specific locations for off-line motorway service areas have been identified in this Plan. Any proposals for such facilities will be assessed against relevant sections in the Spatial Planning and National Roads Guidelines.

Whilst there is text in section 13.12.5 'Service Stations and Retailing' referring to on-line service facilities being assessed against the Spatial Planning and National Roads Guidelines this should be amended so it also includes off-line facilities. Additional text is set out in the Chief Executive's recommendation.

8. See response and recommendation to item 3.
9. Additional text and an associated policy objective could be inserted into section 7.10 'Roadside Signage' referring to the provisions set out in the Spatial Planning and National Roads Guidelines and is detailed in the Chief Executive's recommendation.

10. The preferred route corridor for the N2 Ardee to Castleblayney upgrade was published together with the Option Selection Report in February 2021. The wording of MOV 40 could be amended to make reference to the 'preferred route corridor'. Taking account of the fact that the preferred route has been identified it is not considered necessary to include a reference to the 'potential route corridors'. Amended Policy Objective is included in the Chief Executive's recommendation.
11. Whilst the Council acknowledges the merits of including this policy objective it is noted that there are national roads in the County where the drainage has been designed to accommodate the surrounding the development (e.g. the N33). Taking this into account it is not considered that the suggested objective should be included.
12. Section 13.6.2 'Solar Energy' indicates that 'Glint and Glare' shall be considered when preparing an application for a solar farm development. If a glint and glare assessment is required this can be identified at either the pre-application or application stage of a development. It is not considered any further clarity is required in chapter 13.

With regard to grid connections guidance is provided in the Draft Wind Energy Guidelines (2019) in section 4.7.4. Section 13.16.1 'Wind Energy' states that "Any application for wind energy development shall be prepared in accordance with the requirements of the Wind Energy Guidelines 2006 and any subsequent Guidelines."

Whilst it is acknowledged that these Guidelines remain in Draft at the time of writing it is anticipated that they will come into effect in the near future. Taking this into account it is not considered any additional text or policy objectives are required on this issue in this section.

Additional text could be included in section 13.16.2 'Solar Energy' indicating that in order to ensure the all environmental issues and cumulative impacts of a proposal have been assessed any application shall include details of the grid connection or where this is not possible, details of the most likely corridor of the grid connection, the likely nature of the connection in terms of line voltage, whether it will be underground (preferred) or over ground (including details of pole type) and any ancillary equipment (e.g. substations). Additional wording is outlined in the Chief Executive's recommendation.

13. The section setting out the content of the Design Manual for Roads and Bridges (DMRB) in section 7.3.2 states that the DMRB has been superseded by TII publications. This text can be amended to state that the DMRB has been "subsumed" into TII publications. Amendment included in the Chief Executive's recommendation.
14. Section 13.14.17 'Entrances and Sightlines' indicates that in certain circumstances the TII publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' will apply. Additional text could be inserted to clarify when this document will be applicable.

Chief Executive's Recommendation:

1. Insert the following additional text into section 1.5 'A Positive Outlook' (additional text in red)

As a result of this extended period of flux with economic highs and lows and subsequent volatilities, Louth, like the rest of the Country has had to adapt and adjust to the changes experienced and future proof for those changes yet to materialise. But Louth is a resilient County, and whilst there will be challenges to be faced, there will conversely be opportunities available from which the County can benefit and grow. Located along the border with excellent connectivity to Dublin and Belfast via the M1 Motorway, which forms part of the EU TEN-T Core Network and the inter-city rail link, Louth is an attractive location for UK business that requires access to the EU market and simultaneously Irish, European and International business requiring access to the UK market.

Insert the following additional text into section 5.7 (additional text in red)

5.7 Dublin-Belfast Economic Corridor

Louth is strategically located between the two largest cities on the island, Dublin and Belfast. The excellent connectivity between the cities via the high capacity road link (M1 Motorway), which forms part of the EU TEN-T Core Network, the and inter-city rail link, in addition to the international links via the ports and airports, has created significant opportunities for economic investment and job creation.

Insert the following additional text into **Section 7.7.1** (additional text in red)

The M1 Motorway, which travels through Louth, is a strategically important road link that connects Dublin and Belfast. The M1 intersects with the M50 orbital motorway, which connects the national primary routes which radiate from the M50 to all parts of the country. The M1 forms part of the EU TEN-T Core Network and is an important strategic link within and through the county and region, including providing critical international connectivity and regional accessibility.

Insert the following additional policy objective after MOV 35:

Policy Objective	
MOV XX	Support the improvement, and protection, of the EU TEN-T network and the strategic function of the Dublin to Belfast road network.

2. Insert the following additional section into Chapter 7 'Movement'

Section 7.7.3 Development at Motorway Interchanges

The M1 has the potential to act as a major stimulant of economic development and activity by providing high quality road infrastructure and connectivity to air and sea ports and thereby to domestic and international markets. Motorway interchanges are strategic locations much sought after by developers due to the desirability and benefits of having immediate access to the primary road network. However, uncontrolled and poorly regulated development at interchanges can often be problematic.

This can be due to such development being solely dependent on road transport, the possibility of traffic congestion on national routes, the impact on rural landscapes and environments and the costs involved in the provision of other infrastructure such as piped services, electricity and gas. Such development can also detract investment from existing towns and settlements that are much in need of renewal and development. In order to maximise the benefits accruing to the County from the motorway and to regulate development in a sustainable and appropriate manner along its route, the following policies will be applied.

Policy Objective

Policy Objective	
MOV XX	To promote and facilitate development at urban-related* interchanges in accordance with the zoning provisions for Drogheda and Dundalk as set out on the zoning maps for Drogheda and Dundalk in the Draft County Development and any subsequent Local Area Plans adopted for these settlements.

Policy Objective	
MOV XX	To resist development at rural-related** motorway interchanges

*Urban-related interchanges are Ballymascanlon (Junction 18), Castleblayney Road (Junction 17), Dundalk South interchange (Junction 16) and Drogheda North (Junction 10).

**Rural-related interchanges are Carrickarnon (Junction 20), Drumleck (Junction 15), Charleville (Junction 14), Mooremount (Junction 13) and Woodlands (Junction 12).

3. Insert additional text in section 5.19 (Rural Economy), section 13.11.11.1 (Employment Development in the Open Countryside), section 13.16.1 (Wind Energy), and 13.16.2 (Solar Energy) with regard to access to national and regional roads. (Additional text in red and deleted text in blue with a ~~strikethrough~~)

5.19.3 Rural Enterprises

In relation to the expansion of an existing rural enterprise, consideration will be given to the scale of the existing and proposed development, the capacity of local infrastructure to accommodate the expansion, and the compatibility of the development with the surrounding area.

Any development of a rural based enterprise, either new or expansion to existing in the open countryside, must take account of the traffic related impacts and in particular the traffic movements and capacity of the road network to accommodate a development. There are restrictions on accesses to National and Protected Regional Roads in order to maintain the efficiency and functionality of the National and Regional Road Network which shall be considered if the development is to be accessed off a Protected Road. Further details on these restrictions and exemptions are set out in Table 7.5 and 7.6 in the Movement Chapter. Chapter 13 (section 13.11.11) provides further information on employment development in Rural Areas.

Section 13.11.11.1

Any planning application for an enterprise or employment related development in the open countryside will require a supporting statement setting out a rationale why the open countryside is the most appropriate location for the development. An assessment of traffic movements and in particular large vehicles such as HGVs, tractors, and vans, associated with any development and its potential impact on the local road network taking account the width and alignment of the road will be required to be included with any application. If it cannot be demonstrated that there is capacity in the road network to facilitate a development, it is unlikely that planning permission will be granted.

Any application shall also take cognisance of the restrictions on new or intensification of existing accesses onto National and Protected Regional Roads if the development is to be accessed off a Protected Road. Further details are set out in Tables 7.5 and 7.6 of the Movement Chapter.

13.16.1 Wind Energy

This Plan recognises that onshore and offshore wind energy is an energy source that has an important role in achieving national targets on fossil fuel reduction and greenhouse gas emissions. Map 10.1 in Chapter 10 Utilities provides details of the locations in the County suitable for wind energy development.

The potential benefits of small-scale wind energy developments and community based wind energy developments in mitigating against climate change and raising awareness, and harnessing community involvement in the shift to cleaner sources of energy is recognised and will generally be considered favourable subject to appropriate planning considerations. Any application for wind energy development shall be prepared in accordance with the requirements of the Wind Energy Guidelines 2006 and any subsequent Guidelines.

Details on access, including restrictions on new or intensification of existing accesses onto National and Protected Regional Roads are set out in section 13.4 'Transport' and Tables 7.5 and 7.6 of the Movement Chapter.

13.16.2 Solar Energy

The potential of solar energy as a clean source of energy that will reduce dependence on fossil fuels and assist in achieving national targets on greenhouse gas emissions is recognised. The retrofitting of existing buildings and the integration of solar infrastructure into the design of new buildings will be generally encouraged. Solar energy is also beginning to be developed on a larger scale through the construction of solar farms. At the time of writing, no national guidance had been published for the development of Solar Farms. Pending the publication of any guidance the following criteria shall be considered when preparing an application for a Solar Farm:

- The Landscape Character Area in which the site is located;
- Any environmental sensitivities in the landscape;
- Site contours and levels;
- Site suitability: Brownfield lands or poor agricultural lands;
- Visual impact;
- Ecology;
- Heritage;

- Glint and glare;
- Ground maintenance, soil stripping, storage and maintenance;
- Fencing, security & lighting;
- Drainage and
- Decommissioning.

Details on access, including restrictions on new or intensification of existing accesses onto National and Protected Regional Roads are set out in section 13.4 'Transport' and Tables 7.5 and 7.6 of the Movement Chapter.

4. No Change
5. No Change
6. No Change
7. Insert the following additional text into section 13.12.5 'Service Stations and Retailing' (Additional text in red and deleted text in blue with a ~~strikethrough~~)

13.12.5 Service Stations and Retailing

Proposals for ~~new~~ on-line or off-line motorway service facilities will be assessed in accordance with the guidance set out in the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012).

8. See recommendation to item 3.
9. Insert additional text and an associated policy objective into section 7.10 'Roadside Signage' referring to the provisions set out in the Spatial Planning and National Roads Guidelines (additional text in red)

7.10 Roadside Signage

The nature and extent of signage allowable will be determined by its scale, requirement, location and the classification of the road on which it would be located. Signage on National Roads will be strictly controlled and will generally be only permitted in accordance with the provisions set out in section 3.8 of the Spatial Planning and National Roads Guidelines (2012) and the TII Policy on the Provision of Tourism and Leisure Signage on National Roads (2011).

Further details in relation to Road Signage can be found on the Louth Policy on Non-Regulatory Road Signage, which can be accessed by clicking on this link.

Policy Objective	
MOV XX	Signage on National Roads will be strictly controlled and will generally only be permitted in accordance with the provisions set out in the Spatial Planning and National Roads Guidelines (2012) and the TII Policy on the Provision of Tourism and Leisure Signage on National Roads (2011).

10. Amend the wording of MOV 40 as follows: (Additional text in red and deleted text in blue with a ~~strikethrough~~)

Policy Objective	
MOV 40	To support the progression of the long term upgrade of the N2; and in particular to protect the selected route preferred route corridor of the upgrade road scheme between Ardee and Castleblayney, and prohibit development that could prejudice its future delivery; and to continue to work closely with Transport Infrastructure Ireland, Monaghan County Council, property owners, and residents affected, and other stakeholders in the delivery of this project.

11. No Change

12. Insert additional text into section 13.16.2 ‘Solar Energy’ (additional text in red)

13.16.2 Solar Energy

The potential of solar energy as a clean source of energy that will reduce dependence on fossil fuels and assist in achieving national targets on greenhouse gas emissions is recognised. The retrofitting of existing buildings and the integration of solar infrastructure into the design of new buildings will be generally encouraged. Solar energy is also beginning to be developed on a larger scale through the construction of solar farms. At the time of writing, no national guidance had been published for the development of Solar Farms. Pending the publication of any guidance the following criteria shall be considered when preparing an application for a Solar Farm:

- The Landscape Character Area in which the site is located;
- Any environmental sensitivities in the landscape;
- Site contours and levels;
- Site suitability: Brownfield lands or poor agricultural lands;
- Visual impact;
- Ecology;
- Heritage;
- Glint and glare;
- Ground maintenance, soil stripping, storage and maintenance;
- Fencing, security & lighting;
- Drainage and
- Decommissioning.

In order to ensure the all environmental issues and cumulative impacts of a proposal have been assessed any application for a Solar Farm shall include details of the grid connection. Where this is not possible, details of the most likely corridor of the grid connection (including its width and route), the likely nature of the connection in terms of line voltage, whether it will be underground (preferred) or over ground (including details of pole type) and any ancillary equipment (e.g. substations) shall be provided.

13. Amend the text in section 7.3.2 to state that the DMRB has been “subsumed” into TII publications (additional text in red and deleted text in blue with a ~~strikethrough~~)
Design Manual for Roads and Bridges: The NRA, Design Manual for Roads and Bridges (DMRB) is a series of volumes that provide standards, advice notes and other documents

relating to the design, assessment and operation of National Roads and trunk roads, including motorways in Ireland. These Standards ~~are now superseded by~~ **have been subsumed into** the TII publications.

- 14.** Insert additional text into Section 13.14.17 providing more clarity when the TII publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' will apply. (additional text in **red** and deleted text in **blue** with a ~~striketrough~~)

The following Design Manuals are relevant in the design of new entrances and junctions:

- Streets and Roads with a speed limit of 60km/h or less –(The Design Manual for Urban Roads and Streets), ~~however in certain circumstances~~ **however on national roads in urban areas the** TII publication DNGEO-03084 Treatment of Transition Zones to Towns and Villages on Urban Roads will **be applied in combination with DMURS principles; also apply;** and
- All other roads TII Publications (formerly) Design Manual for Roads and Bridges.

Submission No.	LCDP DR 089
Submitted by:	National Transport Authority (NTA)

Summary of Submission

1. Guiding Principles - The NTA recommends that the preparation of the Development Plan should be guided by and include land use policies and objectives, which support the consolidation of urban-generated development within existing urban areas, and complements the integration of land use and transport planning. This focuses on prioritising development in the most central, accessible locations, giving a high level of priority to walking, cycling, and public transport, particularly in town centre areas.
2. The strategic transport function of national roads should be maintained and protected in accordance with national policy.
3. All non-residential development proposals should be subject to maximum parking standards. In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.
4. For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.
5. It is recommended Local Transport Plans are prepared for all settlements for which a LAP will be undertaken.
6. The policy objectives relating to the preparation of a Local Transport Plan should include a reference to the guidance note on Area Based Transport Assessments published by the NTA in 2019.
7. A timeline for each LAP and Local Transport Plan (which should be prepared in tandem) should be provided in the Plan.
8. The development of larger sites within subject settlements should be contingent on the completion of the LAP/LTP process.
9. Heavy Rail – the Draft Plan indicates that a rail station in Dunleer would improve the rail service for the mid and south Louth areas. Policy objective MOV 14 seeks to examine the feasibility of re-opening the rail station in Dunleer and providing additional rail stations for south Dundalk, north Drogheda, and the mid-Louth area.

As part of the DART+ and Coastal Programme the provision of additional rail stations may be examined. There are currently no plans for the provision of additional stations outside the scope of the DART+ programme.

The provision of rail stations is directly linked to the demand for services which would need to be sufficiently high to justify the investment. It would be expected that the land use zoning and densities proposed as part of the Development Plan would reflect the provision of high capacity public transport infrastructure. Whilst Dunleer is identified as a Self-Sustaining Growth Town, based on the projected population levels it is not clear that the provision of an additional rail station would be warranted.

Whilst the Draft Plan includes a policy objective relating to the provision of additional rail stations there is currently no provision or funding for such infrastructure outside the scope of DART+.

10. Rural Transport – The CDP should acknowledge the role rural transport services can perform in providing for social and economic activity. Policies and objectives supporting the role of rural transport should be included in the Plan.
11. Walking and Cycling – it should be an objective of the Plan that retrospective implementation of walking and cycling facilities where practicable in existing neighbourhoods to give a competitive advantage to these modes of trip making.
12. In order to protect the strategic transport function of the national roads, including motorways, it is recommended that the development Objectives should be in accordance with the DOECLG Spatial Planning and National Roads Guidelines and this should be referenced in the Development Plan.
13. Car Parking – The hierarchy of parking types set out in Tables 13.10 and 13.11 are welcomed however it is suggested in Table 13.11 that it could be clarified that these are maximum parking standards in order to give full flexibility to the particular location and circumstances of each proposed development.
14. Check Cycle Parking requirements in Table 13.12 is in accordance with the Standards set out in the Apartment Guidelines.
15. Policy Objective MOV 5 which relates to accessibility for all in relation to the provision of sustainable transport infrastructure is welcomed. To support the implementation of this policy objective it is recommended that specific objectives are included requiring accessibility audits be carried out for new developments and transport infrastructure including bus stops and taxi ranks, to ensure they provide adequately for all users. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all should also be included.
16. Figure 7.1 provides current mode shares of travel in the County. It is recommended that the Plan includes sustainable transport indicators, including mode share, for the purposes of monitoring the Plan against sustainable development indicators. The NTA would be happy to work with the Council, in conjunction with the OPR, in the development of sustainable transport indicators.
17. Development plan policies should aim to:
 - i) Strengthen the use of existing public transport, and
 - ii) Ensure that existing development can access corridors of existing / planned public transport alignments, and is permeable on foot / bike to the access points, and that future developments are located and laid out to achieve similar levels of access.
18. Public transport can be further encouraged in the development management process by:
 - i) Requiring locations and layouts of development that generate demand for public transport and encourage travel on foot and by bicycle;
 - ii) Requiring the provision of bus stops close to trip generators on regional and local roads, to minimise walking times for passengers;
 - iii) Requiring pedestrian and cycle crossing points on roads, appropriately located relative to public transport stops; and
 - iv) Requiring the provision of public transport bus turning and service regulatory layover facilities where required.

- 19.** The following policies and objectives should be considered for inclusion in the Plan:
- i) It is Council policy to ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees;
 - ii) It is Council policy to ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required;
 - iii) It is Council policy to support and develop public transport routes throughout the County through collaboration with the National Transport Authority;
 - iv) It is an objective of the Council to retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility; and
 - v) It is an objective of the Council to provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.

Chief Executive's Response:

1. This Plan has been prepared in accordance with national and regional policy and supports the principles of compact growth, sequential development. The design and layout of developments will be required to ensure permeability between communities and neighbourhoods with a strong emphasis on walking, cycling, and public transport.
2. The Plan acknowledges the importance of the national road network in providing connectivity and maintaining competitiveness. The policy objectives included in the Plan will ensure the function of the national road network will be protected in line with national policy.
3. The car parking standards set out have categorised the Parking Standards based on Area, with a reduced level of car parking identified in more centrally located areas and areas with a high level of public transport services available. This is aligned with the cross cutting theme of the Draft Plan that advocates a modal shift that will reduce dependence on the private car. Associated with the Car Parking text is a narrative that facilitates a reduction in Car Parking Standards in certain circumstances. It is also recognised however that there can be certain circumstances where there may be a particular requirement for a development to provide a level of car parking in excess of that identified in the Standards. Whilst this situation is relatively uncommon, it does occur, particularly in smaller settlements where the public transport availability would be less frequent. In this regard, it is recommended that the Car Parking Standards are retained as proposed.
4. Section 13.14.13 'Workplace Travel Plans' provides details on when these Plans are required. This includes developments where there will be significant trip demand generated such as new schools or employment developments where there will be in excess of 100 employees.

5. Following the adoption of the County Development Plan there will be a Local Area Plan prepared for Drogheda and Dundalk, and a Local Area Plan prepared for Ardee and Dunleer. The RSES under RPO 8.6 requires a Local Transport Plan to be prepared for Drogheda and Dundalk. Whilst the benefits of a Local Transport Plan in integrating land use and transport planning for large urban settlements are noted, it is not considered necessary to prepare a Local Transport Plan for settlements the size of Ardee and Dunleer. All transport related issues in these settlements can be reviewed as part of the Local Area Plan preparation.
6. There would be no objections to including a reference to this guidance note in policy objective MOV 4.
7. The preparation of the Local Area Plans for Drogheda and Dundalk will be a priority in the work programme of the Forward Planning Team following the adoption of the County Development Plan. As indicated in policy objective MOV 4, the Local Transport Plans for Drogheda and Dundalk will be prepared in tandem with the LAPs. Following on from the completion of the Drogheda and Dundalk LAPs the Local Area Plans for Ardee and Dunleer will be prepared. The timeframe for preparing these Plans will be dependent on resources available. It is not considered necessary to include a specific timeframe for the preparation of these Plans in the County Development Plan.
8. There would be serious concerns regarding the development of larger sites being contingent on the completion of the LAP/LTP process due to the potential impact this could have on the delivery of residential and employment related development in settlements identified for growth at national and regional level.

As part of the preparation of the County Development Plan an Infrastructure Assessment and Land Use Evaluation was carried out (Appendix 2 Volume 3) which identified any constraints in existing infrastructure and the investment required to facilitate the release of the lands for development. Whilst it is acknowledged that such issues could be reviewed in greater detail as part of the LAP/LTP process, it is not considered necessary to wait for these plans to be finalised to release these lands for development.

9. The comments from the NTA indicating that there is no funding available for additional rail stations outside the scope of DART+ are noted and must be considered in the finalisation of the Plan. Whilst the Council would support an improvement in rail services in the County these improvements can only be provided in accordance with national policy. The funding of these projects is made by the national transport agencies and therefore it is considered that the Development Plan should be aligned with the infrastructure projects set out at a national level in the National Development Plan Project Ireland 2040.

It is also accepted that the projected population increase in Dunleer is such that it may not warrant an additional rail station in that the town would not have the critical mass of population to make the investment in a rail station economically feasible. With regard to the projected population growth of Dunleer the OPR submission must also be taken into account, whereby it was recommended that the population increase in Dunleer should not be 30% or more than the 2016 population in accordance with NPO 9 in the NPF.

Taking the above into account it is considered that policy objective MOV 14 is rephrased in order to take account of the comments from the NTA in relation to the lack of funding for additional rail stations outside of the DART+ programme.

10. Section 7.5.9 of the Draft Plan sets out the narrative and policy objective for Rural Transport. Additional text can be included providing more detail on the social and economic benefits of public transport in rural areas. In addition the Council is working closely with the NTA on the preparation of the Rural Mobility Plan 'Connecting Ireland', which seeks to increase connectivity and improve mobility in rural areas. This Plan is due to be published towards the end of 2021. Additional text and policy objectives referring to this Plan will be included in section 7.5.9.
11. The Draft Plan recognises the benefits of walking and cycling and supports the provision of this infrastructure as part of the principles of high quality urban design and creating well connected and permeable streets and neighbourhoods. There would be no objections to the inclusion of an additional policy objective supporting the retrospective implementation of walking and cycling facilities where feasible.
12. It is considered that the Draft Plan is consistent with the Section 28 Guidelines 'Spatial Planning and National Roads'.
13. See response to item 3
14. The Cycle Parking Requirements for Apartments will be updated so they are consistent with the standards set out in the Apartment Guidelines. The ratio of cycle parking could be increased from 2.5% of daily borders to 5%.
15. Whilst there is merit in the inclusion of this policy objective, it is unclear as to the practicalities of requiring such an audit to be carried out i.e. how far would it extend around any subject application site, and who would require to address any deficiencies identified. At the design stage of developments the Council will continue to promote universal design and accessibility for all.
16. The Council would welcome the opportunity to work with the NTA in developing a set of sustainable transport indicators.
17. Increasing the modal share of public transport, improving access to public transport, and improving connectivity and permeability by walking and cycling, are some of the key policy objectives of this Plan and will form an integral part of the public realm and urban design principles of developments to be progressed under this Plan. This is closely aligned to the national and regional policy of creating more compact growth, and a more healthy, attractive environment where there is less reliance on the private car as the primary mode of transport.
18. Section 13.9.7 'Layout' in the Development Management Guidelines in Chapter 13 refers to the layout of residential developments. Further emphasis on the location of public transport provision, including bus turning where required, could be provided. There is also a specific section relating to the layout of employment related development (section 13.11.2). This section refers to the location of public transport provision in employment areas. Additional text referring to the requirement to provide bus turning (where required) could be included. With regard to the location of public transport stops, the Council will continue to liaise with the NTA on this issue.
19. The proposed policies and objectives have been reviewed against the policy objectives included in the Draft Plan. It is considered that the policy objectives in the Plan, in addition to those proposed to be included following the consideration of this submission, are broadly reflective of those recommended by the NTA.

Chief Executive's Recommendation:

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change
6. Insert additional text into policy objective MOV 4 referring to the guidance note on Area based Transport Assessments published by the NTA (additional text in red and deleted text in blue with a ~~strikethrough~~):

Policy Objective	
MOV 4	To prepare a Local Transport Plan in consultation with the National Transport Authority and other relevant stakeholders for Dundalk and Drogheda as part of the preparation of the Urban Area Plans / Local Area Plans for these settlements. These The preparation of these plans will be based on the guidance note on Area Based Transport Assessments published by the NTA in 2019 and these plans will be subject to screening for SEA and AA and full assessments will be undertaken if appropriate.

7. No Change
8. No Change
9. Rephrase policy objective MOV 14 to take account of the comments from the NTA in relation to the lack of funding for additional rail stations outside of the DART+ programme (additional text in red and deleted text in blue with a ~~strikethrough~~)

Policy Objective	
MOV 14	To secure, in co-operation with Iarnród Éireann and the National Transport Authority, improved rail services for the mid and south Louth areas, and in particular to seek to examine the feasibility of re-opening the rail station in Dunleer and providing additional new rail stations for south Dundalk, north Drogheda, and the mid Louth area subject to the availability of funding and a wider economic cost benefit analysis.

10. Insert additional text and policy objectives into section 7.5.9 providing more detail on the social and economic benefits of public transport in rural areas and the Rural Mobility Plan 'Connecting Ireland' currently under preparation by the NTA.(additional text in red and deleted text in blue with a ~~strikethrough~~)

19.5.9.1 Rural Transport

The National Transport Authority has responsibility for the provision of rural transport services across the country. This is delivered through the 'Local Link' Programme and has two main funding streams from the Department of Transport, Tourism and Sport and the Department of Social Protection (Free Travel Pass Scheme).

The objective of this scheme is to reduce rural isolation and social exclusion and integrate rural transport services with other public transport services i.e. scheduled bus and rail services.

The 'Local Link' Service for Louth, Meath, and Fingal is currently operated by Flexibus. This includes door to door and scheduled bus services in towns, villages and rural areas in the County.

The service is community based with the services developed on a partnership approach between various community organisations, the Local Authority and Agencies responsible for accessible transport provision. Journey types provided by this service include work, shopping, social, education and health related journeys.

This Draft Plan recognises the importance of rural transport in providing a social and economic connection between towns and villages, with the Local Link service having a pivotal role in revitalising rural towns and villages that will improve access to employment, public services and social networks that will support a high quality of life in rural areas. Public transport in rural areas also has an important role in supporting and developing tourism in towns and villages through the provision of services that can enable and facilitate visitor accessibility.

As part of the national policy of enhancing connectivity and improving sustainable mobility, the National Transport Authority is preparing a Rural Mobility Plan 'Connecting Ireland', which will seek to increase connectivity and improve mobility in rural areas. The implementation of this Plan would have social and economic benefits to the rural areas of the County by bringing people closer together and making the rural towns and villages more attractive for economic investment. This Plan is due to be published towards the end of 2021. The Council is working closely with the NTA on the preparation of this Plan and improving connectivity and promoting the use of public transport in rural areas.

Policy Objective

MOV XX	To support and work with the National Transport Authority in finalising and implementing the Rural Mobility Plan 'Connecting Ireland' in order to improve public transport connectivity and sustainable mobility between towns and villages in the County.
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11. Insert an additional policy objective in section 7.5.10 supporting the retrospective implementation of walking and cycling facilities where feasible.

Policy Objective

MOV XX	To support the retrospective provision of walking and cycling infrastructure in existing settlements, where feasible, to achieve growth in sustainable mobility and strengthen and improve the walking and cycling network.
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12. No Change
13. No Change
14. Update the cycle parking requirements for apartments in Table 13.12 so are consistent with the standards set out in the Apartment Guidelines and increase the ratio of cycle parking at public transport pick up points as set out in Table 13.12 from 2.5% of daily borders to 5%. (additional text in red and deleted text in blue with a ~~strikethrough~~)

Development Type	Cycle Parking Requirement	
	Long Term	Visitor/Short Stay
Apartment, Flat, Sheltered Housing	1 space per unit Minimum of 1 cycle space per bedroom. For studio units at least 1 cycle space	1 space per 5 units 1 space per 2 units
Public transport pick up points/interchanges	2.5% 5% of daily borders at point/station, minimum of 10 spaces	To be determined by the Planning Authority

15. No Change
16. No Change
17. No Change
18. Insert additional text into section 13.9.7 and 13.11.2 referring to public transport provision (additional text in red and deleted text in blue with a ~~strikethrough~~)

13.9.7 Layout

The layout of residential developments shall consist of permeable, well connected streets and neighbourhoods where open spaces are functional, accessible, and centrally located and where walking and cycling are prioritised. ~~Where~~ When feasible, new developments are encouraged to include pedestrian and cycle links to adjacent residential areas/ commercial developments. Public transport access and any associated bus turning shall be incorporated into the design of any development where required.

13.11.2 Layout

The layout of buildings shall be of a high quality that incorporates design principles including connectivity and permeability with landscaping used to soften the visual appearance and reduce the dominance of buildings. Pedestrian, cyclist, and public transport access (including any associated bus turning, where required) shall be a consideration in the layout of any individual employment building or a group of buildings in a business park or industrial estate.

19. No Change

Submission No.

LCDP DR629

Submitted by:

Office of Public Works (OPW)

Summary of Submission

1. Welcomes acknowledgement of the Guidelines for the Planning System and Flood Risk Management, Measures set out in the Flood Risk Management Plans, & preparation of the Strategic Flood Risk Assessment.
2. Sequential Approach: Land use zoning in flood zones that is inappropriate or require a justification test has been proposed in a number of settlements.
3. Mapping inaccuracy on composite map Carlingford and some maps unclear for Flood Zone.
4. Justification Test: Does not appear to have been applied (& only applies to urban centre).
5. Proposed Flood Defence Schemes: Consider objectives with full regard to the development of flood relief schemes in identified centres.
6. PFRA: Noted that these are only a broad assessment providing an indication of areas that may be prone to flooding
7. Consideration of Climate Change Impacts: Planning authorities in preparing plans need to consider climate change impacts by avoiding development in areas potentially prone to flooding in the future. CFRAM includes maps for 2 potential future scenarios.
8. SuDS: Guidelines recommend SFRA identifies where integrated and areas based SuDS provision and GI are appropriate rather than individual site by site solutions.
9. Arterial Drainage System: No commentary on Boyne & Neagh Bann Drainage Schemes & suggests access requirements preserved on zoned land for maintenance for same. Advises site specific flood risk assessments may be required on benefitting lands.
10. Historic Floods: Advises that flood event records are available.
11. Identifies Settlement by Settlement issues related to Item 2 above. The settlements are: Annagassan, Ardee, Baltray, Carlingford, Castlebellingham/Kilsaran, Clogherhead, Collon, Drogheda, Dromiskin, Dundalk, Knockbridge, Louth Village, Omeath, Tallanstown and Dunleer.

Chief Executive's Response:

1. Noted
2. The need for and importance of the sequential approach (Avoid-Substitute-Justify) to manage flood risk in accordance with the Flood Risk Management Guidelines, is acknowledged in both Chapter 10 of the Draft Development Plan and in the Strategic Flood Risk Assessment (SFRA). Its particular importance at the plan making stage is recognised where it makes use of flood risk assessment and prior identification of flood zones for river and coastal flooding and classification of vulnerability to flooding of different types of development.

In accordance with the Flood Risk Management Guidelines, all mapping of zoned land within each of the settlements has been assessed in line with the sequential approach and subject to individual Justification Tests as per the requirements of the Guidelines and specifically Box 4.1, details of this are available in Appendix 6 and Appendix 7.

3. The inaccuracy on the Composite and Zoning and Flood Maps will be corrected.
4. See Point 2 above for response.
5. Acknowledgement and support for Policy Objective IU 27 is noted. The Council is of the opinion that regard being had to the development of the flood relief schemes as outlined is appropriate. However, rather than a specific standalone policy objective, it is proposed that reference be included to existing Policy Objective IU 27 (and also Policy No. 4 of the SFRA). It is recommended that additional text is included in Policy Objective IU 27 and is outlined in the Chief Executive's Recommendation.
6. Acknowledgement that the PFRA is not a detailed assessment of flood risk but rather a broad assessment based on available and readily derivable data is acknowledged in the SFRA (Section 5.2). Notwithstanding this, it is considered appropriate by the Council that further clarity is provided in the narrative. It is therefore recommended that an additional section be appended to Section 10.3.1 and that a new Section 10.3.2 is included in the Plan. The amendments are contained in the Chief Executive's Recommendation.
7. The observations raised by the OPW in relation to Climate Change Impacts are noted. The potential impacts of climate change, including increased rainfall intensities and increased fluvial flood flows, have been taken into account by the assessment as detailed in the SFRA report and as provided for by various County Policy Objectives.

It is acknowledged that sites adjacent to Flood Zones may become vulnerable to flooding when climate change is taken into account and the CFRAM Programme currently provides maps for two potential future scenarios taking account of different degrees of climate impact - a Mid-Range Future Scenario (average of climate predictions) and a High-Range Future Scenario (most extreme climate predictions).

In response, the Council proposes to amend Policy Objective IU 25 with the addition text outlined in the Chief Executive's Recommendation.

8. Support for the inclusion of Appendix 8 (Green Infrastructure Strategy) and associated supporting Policy Objectives which require the incorporation of SuDS into any new developments is both noted and welcomed by the Council. Reference to reliance on site by site solutions is also noted. In this regard, the Council advises that where possible and practicable to do so, the Council has endeavoured to accommodate a more integrated and area based provision of SuDS and GI a case in point being the North Drogheda Environs LAP and associated Masterplan.

Section 13.5 of the Draft Plan outlines the information and detail to be included in the preparation of a Masterplan. Whilst this includes reference to service arrangements including water, wastewater and surface water, there is no specific standalone reference to SuDS. It is therefore recommended that specific reference be included in Section 13.5 and is detailed in the Chief Executive's Recommendation.

Additionally, through the delivery of the Main Flood Relief Schemes in County Louth, (Dundalk & Ardee, Drogheda & Baltray & Carlingford & Greenore), LCC, in partnership with OPW, shall produce Potential for Natural Water Retention Measures (NWRM) Maps covering the Study Areas involved.

The Potential for NWRM Maps shall map areas that have the potential for the following categories of NWRM:

- runoff reduction;
- floodplain storage;
- sediment management;

Building upon the Potential for NWRM Maps, a NWRM Feasibility Assessment shall be carried out to assess the feasibility of implementing specific types of NWRM, as listed in Table 3.5, to provide some degree of flood risk reduction within the Study Area.

The NWRM Feasibility Assessment shall include an assessment of their costs, delivery routes, and the potential for NWRM:

- to reduce flood risk within the Study Areas;
- to reduce flood risk within the Scheme Areas;
- to mitigate the flood risk impacts of Climate Change;
- to mitigate the environmental impacts of options for any preferred Schemes, and,
- to meet objectives other than flood risk management, including water quality, habitat creation, climate regulation, and the provision of amenity.

In assessing the potential of NWRM to meet objectives other than flood risk management, liaison with relevant bodies in other Sectors, including the EPA, Local Authority Water Programme (LAWPRO), relevant Local Authorities, NPWS, Department of Communications, Climate Action & Environment, shall be carried out to determine the benefits to their respective areas of responsibility.

The findings of the feasibility assessment shall be presented as an appendix to the Options Report, in a NWRM Feasibility Report.

Where it is feasible for NWRM to contribute to flood reduction in the Scheme Areas or to contribute to the mitigation of the environmental impacts of the Schemes, these measures shall be developed as part of the Schemes.

The Schemes may include NWRM that do not provide protection to the full required Standard of Protection of the Schemes, but that may reduce the scale of structural protection works required as part of the Schemes.

Table 3.5

Measure Group	Specific NWRM	Main Action
Woodland creation	Catchment woodlands	Runoff reduction
	Floodplain woodlands	Runoff reduction/floodplain storage
	Riparian woodlands	Runoff reduction/floodplain storage
Land management	Land and soil management practices	Runoff reduction
	Agricultural and upland drainage modifications	Runoff reduction
	Non-floodplain wetlands	Runoff reduction
	Overland sediment traps	Runoff reduction/sediment management
River and floodplain restoration	River bank restoration	Sediment management
	River morphology and floodplain restoration	Floodplain storage/sediment management
	Instream structures (e.g. large woody debris)	Floodplain storage
	Washlands and offline storage ponds	Floodplain storage

Natural Water Retention Measures^[1]

9. Observations in relation to arterial drainage schemes, benefiting lands and access requirements for maintenance are noted.

The Draft Development Plan (IU 23) makes provision for riparian corridors wherein no development takes place within a minimum distance of 10m measured from each bank of any river stream or watercourse. Such a corridor in addition to serving for habitat protection, recreational requirements and flood alleviation also serves for maintenance access requirements. Further, it should be noted that consultation with the OPW is required by the Council in terms of proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible and in relation to proposed developments which include the construction, replacement or alteration of a bridge or culvert. Arterial Drainage Benefitting Land Maps are referenced in the SFRA accompanying the Draft Plan.

For the purposes of clarity and for the information of the public it is considered appropriate that two new policy objectives be included concerning the requirement for consultation with the OPW. It is recommended that a new policy objectives be included and are outlined in the Chief Executive's Recommendation.

10. In response to the observations of the OPW in relation to the Historic Flood event records for Louth, it is recommended amend table 11 of the SFPA. The revised table is included in the Chief Executive's Recommendation.

11. The issues raised in relation to the identified Settlements of Annagassan, Ardee, Baltray, Carlingford, Castlebellingham/Kilsaran, Clogherhead, Collon, Drogheda, Dromiskin, Dundalk, Knockbridge, Louth Village, Omeath, Tallanstown and Dunleer have been addressed under Point 2 above.

*Remove reference to Walk Over Surveys from Section 6.6 of the Strategic Flood Risk Assessment. Change included in the Chief Executives Recommendation.

Chief Executive's Recommendation:

1. No Change
2. No Change
3. Correct inaccuracy on Composite Map (Carlingford) and Zoning and Flood Map (Drogheda)
4. No Change
5. Insert the following additional text (in red) into Policy Objective IU27 and Policy No. 4 (SFRA);

Policy Objective

IU 27	To implement the Flood Risk Management Measures as detailed in the Neagh Bann Flood Risk Management Plan, the Eastern Flood Risk Management Plan and the Dunleer Flood Risk Management Plan. Louth County Council will, in partnership with the Office of Public Works (OPW) deliver the following Flood Relief Schemes: • Dundalk , Blackrock and Ardee • Drogheda and Baltray • Carlingford and Greenore
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1. Amend wording in Section 10.3.1 and include new Section 10.3.2 (additional text in red and deleted text in blue with a ~~striketrough~~);

Section 10.3.1

~~The OPW is the lead agency for flood risk management in Ireland and in 2011 published the Preliminary Flood Risk Assessment (PFRA) mapping for the entire county.~~

The Preliminary Flood Risk Assessment is a national screening exercise completed by the OPW, based on available and readily derivable information and undertaken to identify areas at potential flood risk.

The PFRA study considered flooding from a number of sources, including fluvial, tidal, pluvial and groundwater and resulted in a national suite of broadscale flood maps.

The PFRA is a requirement of the EU Floods Directive and the publication of the work has led to and informed more detailed assessment, which is being undertaken as part of the Catchment Flood Risk Assessment and Management (CFRAM) studies.

It prioritised the areas of greatest potential risk from one or more sources of flooding and designated these as Areas for Further Assessment (AFA), of which there are 8 identified in County Louth.

Section 10.3.2

PFRA mapping has been used to define the flood zones in places outside of the scope of the CFRAM Study and the Dunleer Flood Study. These areas should be treated with caution due to the indicative nature of the PFRA mapping. It is provided for information purposes to help identify areas where flood risk should be explored in greater detail. For this reason, all Zoning and Composite Mapping for each of the Settlements associated with the Development Plan clearly differentiate between flood zones derived from PFRA mapping and the CFRAM Study, on the attached Legend. Any planning application on lands where pluvial flooding is identified will be required to include an assessment of the potential flood risks associated with the development of the lands together with any mitigating measures that will ensure the development and associated infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.

2. Include additional wording (in red) in Policy Objective IU25;

Policy Objective	
IU 25	To ensure all proposals for development falling within Flood Zones A or B are consistent with the “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” 2009. Proposals for development identified as being vulnerable to flooding must be supported by a site specific Flood Risk Assessment and demonstrate to the satisfaction of the Planning Authority that the development and its infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere. In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective applicants for developments in this regard and will be made available to lower-tier Development Management processes in the Council. Applications for development in flood vulnerable zones, including those at risk under the OPW’s Mid-Range Future Scenario, shall provide details of structural and non-structural risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.

3. Include additional wording (in red) in Section 13.5;

Proposals for sustainable urban drainage systems (SUDS) shall be incorporated into the masterplan area;

4. Insert new Policy Objectives under Section 10.3:

Policy Objective	
IU XX	To consult with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible.

Policy Objective	
IU XX	To consult with the Office of Public Works (OPW) in relation to proposed developments which include the construction, replacement or alteration of a bridge or culvert and to require that the developers obtain consent from the OPW under Section 50 of the EU (Assessment and Management of Flood Risks) Regulations 2010 and Section 50 of the Arterial Drainage Act 1945, where appropriate.

5. No Change

2. Volume 5, Environmental Report , SFRA

10. The information is to be appended to Table 11 of the SFRA;

Settlement	Date of Flood	Description
Dunleer	14 th November 2014	17 No. Properties affected when the White River burst its banks at the Barn Road & Lower Main Street after flash flooding.
Coole and Townparks Townlands	December 2015	Significant area of land flooded in Ardee Bog.
Corbollis & Mapastown Townlands	December 2015	Significant area of land flooded.
Aclint & Reaghstown Townlands	December 2015	Significant area of land flooded.
Dundalk	2 nd September 2020	Flooding occurred at Hardy's Lane Dundalk in close proximity to 6 No, properties.
Dundalk	13 th January 2020	Flooding occurred at high tide at 1300hrs following surge from Storm Brendan in Fairgreen & Newry Road.
Drogheda	13 th January 2020	Flooding occurred at high tide at 1300hrs following surge from Storm Brendan in Donore's Green, North Strand, Ship Street & Wellington Quay.

12. Amend text in section 6.6 heading ((deleted text in blue with a ~~strikethrough~~));
 Section 6.6 Strategic Risk Assessment, Level 3, 4, and 5 Settlements; ~~Walk-over~~
~~Surveys~~

Submission No.	LCDP DR0146
Submitted by:	Irish Water

Summary of Submission

1. Acknowledges and supports national and regional planning policy
 - a. Provides an update on national plans and programmes by IW including the Irish Water Investment Plan 2020-2024 & the Natural Water Resources Plan (NWRP)
2. It considers the proposed Core Strategy and the availability of wastewater and water infrastructure.
3. Wastewater Infrastructure:
 - a. Plant capacity varies, where constraints, development applications are on first come basis & where no project to upgrade, infrastructure is developer led. There are sewer network constraints in some areas.
 - b. A Drainage Area Plan (DAP) for Dundalk to be complete in 2021 and commenced in Drogheda in 2021, whilst Network Development Plans will be done for the two towns to see how undeveloped zoned sites can be serviced.
 - c. IW provides details for each settlement in the Core Strategy vis a vis the proposed population uplift to 2027 outlining where there are no issues and where there are issues including *inter alia*: sewer capacity, pumping station capacity, need for network upgrades etc.
4. Water infrastructure:
 - a. NWRP is reviewing Water Resource Zones to resolve deficits nationally and availability of water will be on first come basis.
 - b. The three main WRZs wherein Louth's settlements are located are outlined including commentary on supply. Importance of water conservation and leakage control is highlighted.
5. General Comments:
 - a. Suggested minor amendments to wording including additional/replacement wording.

Chief Executive's Response:

The Council acknowledges Irish Waters submission in relation to the Draft Plan. Commitment to and support of the NPF and the EMRA RSES is noted. Reference to national plans and programmes by IW and specifically in relation to the WSSP and NWRP are noted and are already incorporated into Chapter 10 of the Draft Plan.

The Council welcomes the clear format presented by Irish Water in the submission response regarding the Core Strategy and availability of water services relating to Levels 1-3, wherein capacity or constraints are identified.

The forthcoming Drainage Area Plans and the Network Development Plans for both Dundalk and Drogheda and the continued co-operation and engagement between IW and the Council in this regard and all other such related matters are welcomed.

The Council acknowledges that in both water and wastewater infrastructure, where constraints exist, this will result in a first come, first served basis and regarding water provision, leakage control and conservation is paramount where there are deficits.

The Council has no objection to incorporation of the additional wording and Policy Objectives as proposed in the submission and is included in the Chief Executive's Recommendation.

Chief Executive's Recommendation

1. Volume 1, Chapter 10 , Page 10-2

- Insert the following additional text (New text in red and deleted text in blue with a strikethrough);

Section 10.1.1

'This plan is reviewed on a five yearly cycle *and the first review was completed in October 2020*'.

Section 10.1.1

~~'The CIP, which covers 2020-2024 is currently with the Commission for Regulation of Utilities (CRU) for approval'.~~

The Commission for Regulation of Utilities (CRU) has recently approved Irish Water's third Revenue Control Period RC3, with supporting Investment Plan (2020-2024).'

Section 10.1.2.2

'.....and currently operates thirteen water supply schemes in the County, from ~~five~~ **three** water resource zones.'

Insert new supporting Policy Objectives

Policy Objective	
IU XX	<i>'To support the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans'.</i>

Policy Objective	
IU XX	<i>'To seek to avoid the discharge of additional surface water to combined sewers and promote Sustainable Urban Drainage Systems (SuDS) and solutions to maximise the capacity of towns with combined drainage systems'.</i>

Submission No.	LCDP DR792
Submitted by:	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media

Summary of Submission

1. The submission is broadly subdivided into 4 sections: Archaeological Heritage, Underwater Archaeology, Architectural Heritage and Natural Heritage.
2. Archaeological Heritage:
 - a. Suggests a separate Chapter on Archaeological Heritage
 - b. A clear understanding of Archaeology should inform policy & recommends and provides a statement be included in Plan to this effect.
 - c. Plan should be informed by clear understanding of relevant legislation & therein provides details relating to :
 - i. National Monuments Act 1930-2014: Details to what it provides legal protection, where information can be accessed digitally, obligations there under, etc.
 - ii. Planning & Development Act 2001 and Planning & Development Regulations 2001: Legal requirements relating to archaeological heritage in terms of Development Plans and applications.
 - iii. EIA Directive: EIA to include consideration of archaeological heritage
 - iv. International Conventions: LA's should give effect to the requirements of international conventions to which Ireland is a party, or awaiting.
 - v. Framework and Principles for the Protection of the Archaeological Heritage: While it relates to all development control codes, its essential archaeological issues are addressed in Development Plans as they sit at the centre of the planning and development system.
 - d. Over-arching Objective for protecting archaeological heritage: Outlines it will be an objective of the PA to protect:
 - i. Sites and Monuments in SMR & NMS;
 - ii. Monuments & Places in the RMP;
 - iii. Historic monuments & archaeological areas in the RHM;
 - iv. National monuments subject to Preservation Order and national monuments in ownership/guardianship of Minister ;
 - v. Archaeological objects under meaning of National Monuments Acts;
 - vi. Wrecks protected un National Monuments Acts or included in Wreck Viewer;
 - vii. Archaeological features not as yet identified but which may be impacted by development;
 - viii. PA shall at all times be guided by national policy and specific recommendations by Minister shall be given full consideration;
 - ix. Protection by the PA shall be as a first and preferred option, 'in-situ' preservation and then preservation by record, with further details of this including reporting, publications and financial costs etc. outlined.

- e. Recommended further policies to protect archaeological heritage: A very broad outline of these are provided below:
 - i. Protect and enhance archaeological monuments & historic wrecks, having regard to historic town defences, historic graveyards & national monuments in Ministers or LA's ownership providing tangible evidence of the past;
 - ii. Promote/facilitate access (including disabled) to monuments, developing/maintaining access, signage, interpretative material and virtual access;
 - iii. Ensure all archaeological heritage including underwater heritage are considered in planning process;
 - iv. Promote knowledge of archaeological/underwater heritage & facilitate access to guidance regarding protection etc.;
 - v. Promote early access to public of archaeological excavation results;
 - vi. Support communities in relation to appropriate projects for preservation, presentation and access to archaeological/underwater heritage.
- f. Recommended specific objectives to protect archaeological heritage: A very broad outline of these are provided below:
 - i. Refuse developments that would remove archaeological monuments with above ground features, especially if form significant feature in landscape;
 - ii. First, preserve *in situ* historic wrecks then preservation by record;
 - iii. Preserve *in situ* historic town defences
 - iv. Preservation *in situ* of medieval masonry remains & presentation as part of completed development
 - v. Preservation *in situ* of above ground urban medieval/early modern structures during the development management process
 - vi. Preservation *in situ* of industrial, military, nautical heritage forming part of post medieval archaeological heritage
 - vii. Secure setting, character and amenity of historic battlefields
 - viii. Preserve setting and amenity of all archaeological monuments by ensuring development in vicinity is not detrimental to same
 - ix. Preserve existing and develop further access to monuments for public (including as part of a development)
 - x. Ensure buffer zone between development and town defences
 - xi. Retain street layout, historic building lines and traditional plot widths from medieval or earlier times
 - xii. Protect historic graveyards including setting. Potentially avoid extensions to same but rather identify an alternative location
 - xiii. Manage historic graveyards in LA care as per conservation guidance. Where maintained by local communities, ensure adequate advice given.
 - xiv. Ensure significant archaeological landscapes are considered in the Landscape Character Assessment and preserved
 - xv. Developments to include interpretative material of archaeological features found whether found *in situ* or themselves presented
 - xvi. Signage near monuments to be appropriate
 - xvii. Provide access (real/virtual) to excavations taking place in advance of development.

- xviii. Support incorporation of monuments into designated open spaces and public amenity spaces in a manner compatible with protection and with an accompanying management & conservation plan.
- g. Recommendation for World Heritage Sites and 'tentative list' sites: Welcomes commitment to conserving the Monasterboice World heritage Tentative List site. Advises Department is reviewing this list and LA may want to contact the Department in this regard.
- h. General Recommendations regarding Development Control policies & objectives: For effective protection, all procedures and practices must be followed including referrals to the Department. In house professional archaeological expertise would be helpful. The NMS will seek to engage with the pre-planning process, but developers should be advised by the PA and conduct assessment first.
- i. Recommended Development Control Objectives and Policies: A very broad outline of these are provided below:
 - i. Certain developments be subject to archaeological assessment, generally before permission granted and outlines when such would be applicable
 - ii. Developments in marine environments and inland waterways of archaeological potential should be subject to assessment (generally before grant of permission)
 - iii. Ensure archaeological assessments are in accordance with policies, guidance and specific advice from Department.
 - iv. Applicable applications sent to Department in timely fashion with full account taken of recommendations.
 - v. Refuse permission where development cannot be carried out in accordance with protection of archaeological heritage as outlined in policy and objectives both local and national.
 - vi. Planning permissions to contain appropriate conditions to secure protection of archaeological heritage in accordance with relevant policies and standards and guided by the Department as arises.
 - vii. Where preservation *in situ* is required by condition, further conditions may require long term conservation, management and monitoring measures with steps to be taken in event of measures being ineffective.
 - viii. Where preservation by record is required by condition, such conditions will require e.g. follow up reports, analyses etc. and the conservation of archaeological material and objects recovered
 - ix. Conditions may require presentation of features to the public *in situ* on site and/or provision of interpretative material at the site
 - x. Where condition requires excavation, a further condition allowing public access may be imposed
 - xi. Conditions to make clear costs for protection of archaeological heritage are to be borne by developer
 - xii. Develop PA's professional archaeological expertise.
- j. Recommended Climate Change Policies & Objectives for Archaeological Heritage:
 - i. Promote awareness & adaptation of Irelands built heritage to deal with effects of climate change
 - ii. Identify built and archaeological heritage in LA ownership and areas at risk from climate change.

- iii. Undertake climate change vulnerability assessments for historic structures, sites and wrecks
- iv. Develop disaster risk reduction policies to address direct and indirect risks
- v. Develop resilience & adaptation strategies
- vi. Develop LA skills capacity to address adaptation/mitigation/emergency management issues affecting historic structures/sites to avoid damage
- k. Recommendations to PA's on information & appendices to be included in the plan:
 - i. Include RMP in Appendix or link in electronic form
 - ii. Include wreck records or link to wreck viewer in electronic form
 - iii. Include all registered historic monuments, those subject to preservation order and monuments for which Minister or LA is owner/guardian
 - iv. Historic towns with subsurface archaeological deposits are in the RMP and the RMP map identifies these as Zones of Archaeological Potential. This should be incorporated in the Plan so all understand their issues.
 - v. In relation to the UNESCO World Heritage Site the following is proposed:
 - a) Include reference to Townley townland within the WHS Buffer Zone
 - b) Rewording of requirements of the Operational Plan referenced in page 9-7
 - c) Insert correct title of relevant Department
- 3. Underwater Archaeology: Archaeological heritage and underwater cultural heritage needs to be updated. Need to reference:
 - a. Shipwreck resource off Louth coast and that section expanded to include inland waterways, rivers lakes etc. e.g. piers, harbours etc.
 - b. Development can have direct & indirect effect on underwater cultural heritage e.g. Flood relief Schemes. Specific assessments (e.g. Flood Relief Assessments) can inform the cultural heritage potential for areas that may be impacted and this can in turn facilitate an agreed management and protection strategy for the archaeological heritage.
 - c. Should be policies on protection on terrestrial and underwater cultural heritage, with provision for adequate assessment and protection of same
 - d. LCC should take consideration of the following:
 - i. Over-arching objective for protection of all archaeological sites under the NMA and to include wrecks in the NMA or the Wreck Inventory of Ireland Database (WIID)
 - ii. WIID lists a high volume of wrecks for Louth and many unknown wrecks await discovery
 - iii. Wrecks 100 years+ are automatically protected and these require appropriate objectives for their protection. There is high potential for previously unknown archaeological features to be present and this should be reflected in the Plan.
 - iv. All aspects of archaeological heritage and underwater cultural heritage in all environments are to be considered in the development process, including impacts on unidentified elements of such heritage. Areas developed around watercourses or reclaimed areas may contain known or unknown archaeological sites etc. and these should be considered in Plan policies.

- v. Certain developments should be subject to archaeological assessment, generally carried out before permission is granted. Specifics in relation to this are provided. Further, development on a lake should be subject to an assessment or forwarded to the NMS.
 - vi. Development not to be detrimental to the character of an archaeological site/setting in the vicinity of any terrestrial or underwater site of archaeological interest.
 - e. Archaeological Assessments: It is policy that certain developments (size, nature, location) should be subject to archaeological assessment and include those close to a monument or site, extensive in terms of area, length and those requiring EIA. Archaeological heritage can include:
 - i. National monuments owned/in guardianship of State/LA
 - ii. Archaeological & architectural monuments/sites on RMP
 - iii. Monuments in RHM
 - iv. Zones of Archaeological Potential in Historic Towns
 - v. Underwater Archaeological Heritage including wrecks
 - vi. Previously unknown and unrecorded archaeological sites (terrestrial and underwater)
 - vii. Potential sites in vicinity of complexes of sites or monuments
 - viii. Existing/former wetlands, rivers, lakes etc.
 - ix. Objects/artefacts of known potential archaeological significance including modern period & recent past.
 - f. Climate Change: Published document 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage' (2019) as part of the National Adaptation Framework for Climate Change should be considered as policy for S9(6) of the P&D Act 2000. Climate change adaptation must be built into all policies including the development Plan.
- 4. Architectural Heritage:**
- a. Built heritage should be considered as integral part of wider built environment and dealt with holistically through the plan. The appointment of a conservation officer is recommended. The renewal of a number of national policy documents provide the context for the response and the policies of these should be incorporated into future development plans. An overview of policy context is provided and there are a number of areas that require greater focus in future development plans and policies which are:
 - i. National Policy on Architecture – Places for People: ensuring high quality architecture and quality placemaking and best practice in maintenance of buildings.
 - ii. Heritage Ireland 2030 (Draft): Importance of communication, digital opportunities and community engagement as part of delivery of built heritage policies.
 - iii. National Inventory of Architectural Heritage: to address damage and cultural loss of early settlements and their setting due to lack of awareness, demolition etc.
 - iv. Built Vernacular Strategy (Draft): enhance our understanding to hand on to

- others
- v. Pleasure Landscape- policy inclusion for planned landscapes and their survival and evolution
- vi. Climate Change: measures to ensure long term survival of historic structures, uses and contribution to the sense of place
- vii. Town revitalisation: policies for heritage led urban regeneration, understanding cultural layering, reuse, renewal of historic fabric etc.
- viii. Identification, reuse and repair of early urban buildings
- ix. Flood Relief Works including high quality design of new infrastructure and co-ordination with public realm in urban areas
- x. Tall buildings in historic urban centres mitigation of negative impact through consideration of design criteria and guidance.
- b. Local Authority Climate Change Adaptation Strategy: There is ongoing consultation with the CAROs to ensure a consistent approach to protection and adaptation of heritage across the country. Suggests recommendations in relation to LA adaptation strategies:
 - i. Identify architectural heritage that may be under threat directly or indirectly due to climate change
 - ii. Include objectives to carry out climate change risk assessments for historic structures and sites
 - iii. Include objectives for disaster risk reduction policies for direct and indirect risks to architectural heritage
 - iv. Include objectives to develop resilience and adaptation strategies
 - v. Develop skills capacity in the LA
 - vi. Where there is conservation/heritage officer should sit on the LA's Adaptation Steering Group.
- c. Revitalisation of Historic Urban Centres– cities, towns, villages:
 - i. Department is key stakeholder in revitalising historic urban centres including innovative policy, guidance and best practice for reuse of existing buildings. A National Policy on Architecture is being developed. The importance of the Collaborative Town Centre Health Check Programme (CTCHCP) in informing future town management was welcomed.
 - ii. Departments built heritage grant schemes were revised to tackle climate change resilience and a conservation officer can oversee and implement these.
 - iii. Urban centres provide the opportunity to focus on challenges and opportunities that climate change adaptation and re-purposing of the extant building stock will bring. Historic buildings can catalyse repopulation of inner city areas.
 - iv. CTCHCP health check surveys provide the imperative to the Local Authority and the basis to be more attentive to wellbeing of towns. These types of tools (i.e. health checks, Living Town Initiatives etc.) enables built heritage to be reused and adapted successfully.
 - v. Policy: Suggests inclusion of policies. A very broad outline of these are provided below:
 - 1. Consider concepts of historic urban landscapes as a collection of buildings at various scales of settlement that give rise to their special

characteristics in terms of the insertion of new buildings and managing their impact.

2. Consider *Town first* approach to revitalising historic urban centres, a multi-disciplinary team looking at upgrading existing historic buildings and adaptation to new uses
 3. Promote heritage led regeneration of core built heritage sites in urban centres
 4. Consider identification of built heritage at risk register for management, attracting funding and using legislation to safeguard protected structures
 5. Promote best conservation practice
 6. Support infill in backlands in towns appropriate to and respectful of character of historic centre
 7. Draw on the historic environment viewer to compile information on the evolution of historic places
 8. Co-ordinate large infrastructural projects (e.g. public realm works, alternative modes of transport) to the benefit of surviving historic sites to improve their enjoyment, presentation and enhanced accessibility.
- d. National Inventory of Architectural Heritage (NIAH):
- i. Outlines the process whereby the Minister can make recommendations regarding inclusion in the Record of Protected Structures, LA must have regard to these, and if does not comply must provide reason to Minister.
 - ii. In LCC a number of sites were recommended for inclusion in the RPS. LCC has included a number of the sites as Protected Structures and as part of ACAs. Those not formally protected benefit from protection through S53 (2) of the legislation.
 - iii. Outlines purpose of NIAH to aid protection and conservation of built heritage and refers to the website 'Buildings of Ireland'. All counties will in time be updated.
 - iv. Policy: Suggests inclusion of policies. A very broad outline of these are provided below:
 1. Consider inclusion of all structures on the NIAH in the RPS
 2. Consider they are regarded as 'Candidate Protected Structures' pending inclusion on RPS
 3. Direct public to www.buildingsofireland.ie
- e. Built Vernacular Architecture: Characteristic of local communities and environments and rooted in tradition. Details the types of such buildings and how they differ from formal architectural designed buildings. They display an intimate connection to the landscape through siting, orientation etc. Vernacular materials are essential for the repair of such buildings. The stock of vernacular buildings has diminished greatly. But new uses and rehabilitation can contribute to sustainable development.

- i. Policies: Suggests inclusion of policies. A very broad outline of these are provided below:
1. High Level in Plan
 - a. Vernacular buildings are characteristic of local communities and contribute to their authenticity
 - b. Promote appropriate rehabilitation, reuse etc. using best conservation practice
 2. Rural Housing/Settlement:
 - a. Proposals for sensitive reuse of disused vernacular houses won't be subject to Rural Settlement Strategy for housing in the countryside. If a building is derelict measures should be taken to protect it from collapse.
 - b. Presumption against demolition of vernacular buildings where restoration is feasible.
 - c. Consider uniqueness of vernacular buildings and ensembles in terms of their relationship with the immediate environment as a guide for modern design approaches in rural areas.
 3. Climate Change & Sustainability/energy efficiency:
 - a. Recognise inherent sustainability of vernacular buildings
 - b. Ensure continued sensitive rehabilitation/reuse
 - c. Ensure conservation & reuse of traditional materials
 - d. Retention & rehabilitation of all historic buildings allows materials and energy of these buildings to be harnessed
 - e. Where demolition is sought this must be accompanied by report prepared by appropriate professional & outline why remedial works not appropriate
 - f. If destroyed by fire LA can consider demolition but also accompanied by report by appropriate professional. Rural settlement strategy should then apply.
 - g. Measures to upgrade energy efficiency acknowledge inherent characteristics & have no detrimental effect
 - h. Support appropriate energy upgrades through dissemination of factual information to public.
 4. Rural Development/farm diversification/tourism:
 - a. Encourage sensitive reuse of these buildings for a range of uses. Highlights guidance & information in this regard
 5. Architectural Heritage/Conservation:
 - a. Protect, enhance the character and setting of vernacular buildings etc.
 - b. Development affecting these buildings must have a measured survey, photo record and report by appropriate professional
 - c. Facilitate appropriate high quality design solutions for adaptation of these buildings
 - d. Extensions should be sympathetic to the building & setting & generally to the rear
 - e. Promote protection of character & setting of these buildings

- including historic gateways, boundaries etc.
- f. Ensure developments adjacent to vernacular settlements respect the spatial character, building forms etc.
- g. Promote protection of thatched buildings
- h. Maintain up to date record of thatched buildings
- 6. Rural settlement/architectural conservation:
 - a. Consider protecting vernacular settlements by ACA designation. Promote reuse of buildings therein.
- f. NIAH – Garden Survey/Cultural Landscape: Outlines its importance, its significance as a source of historical and societal information and resources of biodiversity.
- i. Policies: Suggests inclusion of policies. A very broad outline of these are provided below:
 1. Identify for protection, significant historic designed landscapes, demesnes and gardens in the Plan
 2. Designate ACA's where appropriate
 3. Identify/protect views to/from these places
 4. Encourage Conservation Plans for long term conservation of these landscapes
 5. Co-operate with NIAH in assessing/celebrating these places
 6. Encourage/facilitate retention & maintenance of these places & components
 7. Encourage cataloguing plant collections etc. in these places
 8. Encourage cataloguing fauna in these places
 9. Protect/promote heritage & traditional varieties of plants/trees in these places
 10. Promote public awareness and access to these places
 11. Preserve/protect their biodiversity
 12. Promote enhancing their character & setting and resist proposals that would cause harm etc.
 13. Outlines detailed appraisals that should be required for proposed developments within or adjacent to these places
 14. Outlines guidance notes to which regard should be had in the appraisal and description of these places.
- g. Nature Conservation: This is considered on a chapter by chapter basis as per the Plan format. The general approach taken in relation to conservation of biodiversity, natural resources, GI, Natura 2000, pNHA and natural habitats etc. is commended. There is concern regarding potential impacts on Louth's coastal Natura 2000 sites that may arise from constructing the greenway and possible detrimental effects. Where integrated into construction of flood defences the effects will need to be taken into account when evaluating the impacts of the construction on the Louth coastal Natura 2000 sites.
 - i. Chapter 1: Following Suggestions:
 1. Refer to value of Boyne in terms of flora & fauna in S 1.2.1 and importance of natural habitats of Dundalk Bay in S1.2.2. Suggests rewording of NIR to NIS.

- ii. Chapter 2: Additional wording to SS 18: ‘while maintaining the integrity of the Boyne Natura 2000 sites’. Similarly SS 33 to include: ‘while maintaining the integrity of the Dundalk Bay Natura 2000 sites’. A new policy broadly requiring preservation of the Natura 2000 sites of Boyne, Blackwater, Boyne Coast and Estuary by ensuring development in Drogheda is subject to AA. Similarly in Dundalk a policy requiring the preservation of the Natura 2000 sites of Dundalk Bay by ensuring all development in Dundalk is subject to AA.
- iii. Chapter 6: Drop the word ‘screening’ from TOU 10. Provides advice concerning the future AA for Narrow Water Bridge and the operation of a section of the greenway
- iv. Chapter 7: Details the Great Eastern Greenway and Louth Coastal Way constructed and/or proposed from Portadown to Carlingford, and to Dundalk including reference to the flood defence works. There are no maps for the greenway from Dundalk to Blackrock or Baltray to Drogheda. Collectively these greenways could potentially impact on Natura 2000 sites. An AA and other environmental assessment of any stretch along or close to the coast will require the assessment of in-combination impacts as well as the effects of other sections of the greenway to which the particular section may be connected. Beneficial to see route selection processes for intended greenways avoiding impacts on European sites. Should identify suitable route avoiding significant impacts and then designed to reduce impacts.
- v. Chapter 8: The approach adopted here is strongly supported.
- vi. Chapter 12: Section 12.7.3 confuses greenways with Green Infrastructure.

Volume 5: Proposed rewording in Table 8.2 to read ‘..to loss of/damage to biodiversity in designated sites (including European sites and Natural heritage Areas).

Chief Executive’s Response:

Archaeology:

In the preparation of the Draft Plan, a standalone chapter was devised to deal specifically with Built Heritage and Culture (Chapter 9). This is considered appropriate and it is not proposed to subdivide this further. For the purposes of clarity, it is recommended that additional text be included in Section 9.2 Policy Context.

It is considered that a clear understanding of archaeology has informed the Draft Plan. Notwithstanding this the inclusion and reworking of the text proposed into Section 9.3 of the Draft Plan will enhance the existing narrative.

Whilst the relevant legislation protecting Archaeological Heritage is already referenced in the Draft Plan, the inclusion of additional text to Section 9.3 will provide further clarity and direction in this regard.

Observations in relation to requirements of the Planning and Development Acts 2000 (as amended) in addition to the EIA Directive are noted. Regarding the 'Framework and Principles for the Protection of the Archaeological Heritage' this is already referenced in Section 13.17.1 of the Draft Plan. Nonetheless it is considered appropriate that additional reference to the framework be included in the narrative in Section 9.3 and Policy Objective BHC 1 of the Draft Plan stating that policies set out therein will be taken into account during the planning process.

Regarding archaeological heritage, the details of which are provided in the narrative of Section 9.3, protection of such is provided in both strategic objective (SO 7) and in the numerous policy objectives (BHC 1- BHC 14). Additional text will however be appended to Section 9.3 (pg. 9-3) specifying all elements of archaeological heritage and other features in order to provide clarity.

Policy Objective BHC 1 acknowledges how through the planning process regard will be had to the advice and recommendations of the National Monuments Service. The importance of preservation *in situ* as the first option is also recognised in BHC 1 where at a minimum preservation by record rather than preservation *in situ* is only permitted in exceptional circumstances (see amended policy below).

Regarding recommended further policies for inclusion in the Draft Plan, Policy Objective BHC1, will be amended to include the wording 'to enhance' in addition to the amendments proposed above.

On foot of the submission, additional policy objectives are proposed to be included. It is noted that there are an additional 18 recommended specific objectives proposed for inclusion within the Draft Plan. A number of these relate to the preservation *in situ* of specific archaeological features, preservation of settings, town walls and street layout. However, it is considered that these are addressed under existing policy objectives BHC 1- BHC 6.

Interaction and liaison between the Council and the National Monuments Service will ensure that regard will be had to both recommendations and advice from the latter. It is considered appropriate and recommended that additional wording be included in BHC 4 and an additional Policy Objective relating to historic battlefields and landscapes of archaeological interest is included.

Observations in relation to the World Heritage Sites and 'Tentative List' are noted. With regard to development control policies and objectives, the Council works in close liaison with the NMS in referring planning applications, securing recommendations and implementing same through requests for additional information where required and/or the imposition of conditions on a successful planning application.

Where relevant, the Planning Authority would advise a developer during the course of the pre-planning process of archaeological heritage where present. In relation to advising the developer to carry out an initial archaeological assessment prior to consultation with the NMS, this is considered an operational matter exercised by the PA, it is not considered to fall within the remit of the Draft County Development Plan.

In relation to the proposed development management objectives, it is considered that BHC 6 adequately addresses issues in relation to archaeological assessment. Again, as a result of correspondence and liaison during the course of a planning application, the Planning Authority can ensure compliance with the advice and recommendations of the NMS. In relation to archaeological assessment and determination of planning applications with reference to the 'Framework and Principles for the Protection of the Archaeological Heritage' it is considered that this is addressed through its included reference in the amended BHC 1 (detailed above). It is considered that other recommended development management objectives can be dealt with through the imposition of conditions specific to individual planning applications following liaison between the planning authority and the NMS.

Regarding recommended information to be included in the Draft Plan, this is noted. Such links (www.archaeology.ie), listings (National Monuments in Louth in State Care and National Monuments subject to a Preservation Order) and mapping of Zones of Archaeological Potential are detailed in the Draft Plan. It is recommended however that the link to the Wreck Viewer be included in the Draft Plan for the additional information of the public.

Townley Hall is not within the Buffer Zone.

Proposed amendments to update text in Section 9.3.5 in relation to Outstanding Universal Value is appropriate and should be included.

In line with the submission in relation to Underwater Archaeology, the lack of reference thereto in the Draft Plan it is recommended that a new section be appended.

The relationship between climate change and archaeological heritage is acknowledged. Climate Change Adaptation and the associated risks to the built environment are highlighted within Section 12.7.2.

It is considered appropriate to make reference to the 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage' within the third paragraph of section 12.5.6 National Adaptation Framework.

Architectural Heritage:

The appointment of a Conservation Officer lies outside the remit of the Draft Development Plan.

With regard to the range of new areas of interest as outlined, the Council will consider the full legislative provisions and supporting guidance and policy documents issued to give effect to legislative provisions and as per additional narrative as outlined above.

The Council in the Draft Plan has recognised the benefits of the Town Centre First Approach and in this regard has included a specific Policy Objective EE68 which supports this approach and the establishment of any future town centre management initiatives that seek to promote this approach. The Council engaged in a CTHCP in relation to Dundalk in 2019 and this is referenced in the Retail Strategy. Best conservation practice is promoted (BHC 20) and is assistance to owners to make protected structures more climate resilient (BHC 25). In terms of the NIAH, the Council has in the preparation of the RPS had full regard to the NIAH. Over intervening years structures may have been removed either through the development plan process (submission) or through the Section 55 process. It is recommended that users of the LA service should be directed to the information resources of the NIAH website. It is therefore recommended that the additional reference be included.

The Draft Plan acknowledges vernacular heritage in both the narrative and the corresponding policy objectives in both the rural and urban setting and promotes where feasible, its protection, retention, maintenance and revitalisation and generally resists the demolition or replacement of such structures. Encouragement of their re-use and adaption in a manner compatible with their character is also promoted.

The rich heritage of Louth's Historic Gardens and Designed Landscapes is also acknowledged in the Draft Plan where they are both listed and mapped. Their protection is supported by appropriate policy objectives which seek to ensure that new development does not adversely affect the site, setting and views and requiring an appraisal of the landscape, an assessment of the trees and in certain cases the utilisation of 3D Digital Survey Modelling tools to demonstrate there is no adverse effect on the site.

The reference to Guidance Notes prepared by Cork County Council and the Architecture Heritage Protection Guidelines 2011 are noted and a new policy objective should be included in this regard.

Section 12.5.9 of the Plan addresses the Louth County Council Climate Change Adaptation Strategy. It is considered that the suggested recommendations would be more appropriately considered upon review of the Louth County Council Climate Change Adaptation Strategy rather than the County Development Plan.

Nature Conservation

Support for the approach taken to the conservation of biodiversity and natural resources, the emphasis on the preservation of the green infrastructure including Natura 2000 sites and pNHAs, natural habitats and other areas of biodiversity value in urban and rural areas is welcomed. Concern regarding impact on the coastal Natura 2000 sites in terms of their Qualifying and Special Conservation Interests as a result of construction of a section or in combination impacts of several sections of greenway, is noted.

This element of the Submission on Nature Conservation is subdivided according to the Chapters of the Plan and this is how the remainder of the response will be addressed.

Chapter 1:

- It is not recommended that the additional and specific text in relation to the wildlife habitats and wintering waterfowl etc. in Drogheda and Dundalk are referenced at this location (Sections 1.2.1 and 1.2.2) as this is a very general overview of the two Regional Growth Centres reflective of the RSES structure.
- Welcome of recognition in the Draft plan for national heritage, green infrastructure and environmental protection (1.7.2) is noted. It is not recommended that there is any amendment in relation to Section 1.7.3 regarding a change in the term of NIR (Natura Impact Report) to NIS (Natura Impact Statement).

Chapter 2:

- **Drogheda**
 - It is recommended that the additional text to Policy SS 18 be included.
 - It is not recommended to include an additional policy regarding the requirement for AA for all developments in Drogheda and environs as this is adequately covered in Chapter 8, Policy Objectives NBG 3-NBG 6.
- **Dundalk**
 - It is recommended that the additional text to Policy SS 32 be included.
 - It is not recommended to include an additional policy regarding the requirement for AA for all developments in Dundalk and environs as this is adequately covered in Chapter 8, Policy Objectives NBG 3-NBG 6.

Chapters 3,4 and 5: No Comment**Chapter 6:**

- The recommendation to remove the word 'Screening' from TOU 10 is noted and it is considered appropriate to reword this policy objective.

Chapter 7:

The construction of the Louth Coastal Way Greenway is to be delivered as part of the Coastal Defence Project. The design of the Flood Defence Schemes are in their infancy and therefore there are no details available with regard to the route of the Greenway. The design and development of the Greenways will be the subject of the required environmental assessments which will consider potential impacts on European Sites.

Chapter 8:

Approach adopted, Green Infrastructure Strategy, Wetland Survey and proposals for adoption of the Draft Louth Biodiversity Plan is strongly supported.

Chapter 10: See Chapter 7

Chapter 12: Section 12.7.3 acknowledges that Greenways represent only one aspect of Green Infrastructure and therefore no change is recommended.

Chapters 13 & 14: No Comments

Volume 5 SEA: It is recommended that the rewording of Table 8.2 be implemented.

Chief Executive's Recommendation:

- Include additional text (in red) as follows to Section 9.2 (page 9-1)

The preparation of this chapter has had regard to relevant national legislation and guidelines, regional and local plans and policies, and the need to ensure that the Plan is compliant with all relevant EU and national legislation and regulations in relation to the protection of the built and cultural heritage of the county.

A new National Heritage Plan 'Heritage Ireland 2030' is currently being drafted by the Department of Culture, Heritage and the Gaeltacht. It will be a coherent, comprehensive and inspiring framework of values, principles, strategic priorities and actions to guide and inform the heritage sector over the next decade. The National Planning Framework through NS07 and NPO60 highlights the rich qualities of our natural and cultural heritage and their conservation and enhancement in an appropriate manner to their significance. The Regional Spatial and Economic Strategy for the Eastern and midland Region recognises that culture and heritage are an integral part of Irish life from their intrinsic value to their wider social benefit to their economic potential. The Council will consider full legislative provisions and supporting guidance and policy documents issued to give effect to legislative provisions.

There are a significant number of Section 28 and other government Guidelines which relate directly to the built heritage. The Architectural Heritage Protection – Guidelines for Planning Authorities (2011), published by the Department of Arts, Heritage and Gaeltacht is the main planning policy guidance document in respect of our built heritage. Other relevant guidance includes the Framework and Principles for the Protection of Archaeological Heritage (1999).

- Replace the following text in Section 9.3 Archaeological Heritage: (New text in red and deleted text in blue with a strikethrough);

~~Archaeological heritage consists of the surviving material remains left behind by past societies and consists of known and as yet unidentified sites, objects and monuments whether situated on land or under water.~~

With New Text (Page 9-1) as follows:

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; and includes the study of relatively recent societies. 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 and as yet unidentified in all environments.

In addition to helping us to understand how humans in the past interacted with the environment, to formulate an explanation for the development of cultures and to preserve the history for present and future learning. It is a finite and fragile resource, which enriches our landscapes and townscapes, and is vulnerable to modern development and land use changes. Its preservation is a legitimate objective against which the need for development must be balanced and assessed.

- Amend existing Text in Section 9.3 by inclusion of additional text (Page 9-1) as follows: (New text in red and deleted text in blue with a strikethrough);

The *National Monuments Acts 1930-2014* is the **specific national** legislative ~~code addressing protection of archaeological heritage, protecting all archaeological objects and wrecks 100 or more years old, or monuments of archaeological or other categories of interest.~~ **for protection of monuments, historic wrecks and archaeological objects providing 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.**

- Include additional text (in red) to Section 9.3 (Page 9-1) as follows:

Its preservation is a legitimate objective against which the need for development must be balanced and assessed. **National policy in relation to archaeological heritage is set out in the 'Framework and Principles for the Protection of the Archaeological Heritage' (Government of Ireland 1999). The Draft Plan will be guided by and will seek to ensure that policies set out therein will be taken into account and implemented appropriately through the planning process.**

Additional text (In red) to Section 9.3, (page 9-3) to read as follows:

The protection of archaeological heritage and other features includes the following:

- **Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).**
- **Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.**
- **Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.**
- **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.**
- **Archaeological objects within the meaning of the National Monuments Acts.**
- **Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.**
- **Archaeological features not as yet identified but which may be impacted on by development**

Amend Policy Objective BHC 1 to read as follows:

To protect **and enhance** archaeological sites, monuments, underwater archaeology, and archaeological objects ~~which are~~ listed in the Record of Monuments and Places (RMP), **and/or the Register of Historic Monuments** and seek their preservation (i.e. **presumption in favour of** preservation in situ or in exceptional cases, **at a minimum**, preservation by record) through the planning process and having regard to the advice and recommendations of the National Monuments Service of the Department of Culture Heritage and the Gaeltacht **and the principles as set out in the 'Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands 1999).**

Include additional New Policy Objectives

Policy Objective	
BHC XX	To protect known and unknown archaeological areas, sites, monuments, structures and objects, having regard to the advice of the National Monuments Services of the Department of Culture Heritage and the Gaeltacht.

Policy Objective	
BHC XX	To promote awareness and knowledge of the archaeological resources of the County and support initiatives, where appropriate, that provides better access to the historic built environment.

Policy Objective	
BHC XX	To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monuments and Places (i.e. preservation in situ or in exceptional circumstances, at a minimum preservation by record) having regard to the advice and recommendations of the National Monuments Section of the Department of Culture, Heritage and the Gaeltacht.

Reword existing Policy Objective SC 45 to read as follows:

Policy Objective	
SC 45	To protect and maintain historic graveyards within the County To protect historic graveyards and encourage their management and maintenance in accordance with best conservation practice.

Additional wording to BHC 4 to read as follows:

Policy Objective	
BHC 4	To protect and preserve in situ, all surviving elements of medieval town defences (both upstanding and buried) and associated features in accordance with as detailed in the Conservation and Management Plans as applicable and with National Policy on Town Defences (Department of Environment, Heritage and Local Government 2008)

Include additional policy objective:

Policy Objective

BHC XX	To seek to protect historic and archaeological landscapes including battlefields, from inappropriate development.
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Include link to the following:

(www.archaeology.ie/underwater-archaeology/wreck-viewer)

- Amend Text to Section 9.3.5 (Page 9-11) as follows: (New text in red and deleted text in blue with a strikethrough);

In accordance with the Operational Guidelines for the Implementation of the World Heritage Convention (2019) ~~(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.~~ 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 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~~ of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

In line with the submission in relation to Underwater Archaeology, the lack of reference thereto in the Draft Plan it is recommended that a new section be appended as follows:

Include new Section after 9.3.1 as follows:

Maritime Archaeology

Ireland's waterways – both marine and freshwater – have been central to the development of life on this island and consequently Ireland has a longstanding maritime legacy. While a significant number of shipwrecks have been recorded from around the coast by the National Monuments Service, it is estimated that there are significantly more as yet undiscovered. Other cultural remains, such as submerged landscapes, harbours, landing places, attest to Ireland's rich underwater cultural heritage which is found in Ireland's designated waters, along the Irish coastline, in the rivers, canals, wetland environments etc.

The underwater cultural heritage is a finite and irreplaceable resource with both manmade and natural pressures threatening its preservation. The NMS is tasked with the protection and preservation of the Country's underwater cultural heritage and maintains

The Wreck Viewer (www.archaeology.ie/underwater-archaeology/wreck-viewer) and Wreck Inventory of Ireland Database (WIID) which holds records of over 18,000 known and potential wreck sites and this is used as a tool to help manage and protect historic wrecks. Any development either above or below water, including to river banks or coastal edges, within the vicinity of a site of archaeological interest shall not be detrimental to the character of the archaeological site or its setting. Planning applications will be referred to the National Monuments Service where relevant.

Include additional text to end of Section 9.1

The Council will seek to protect the County's built and archaeological heritage from the direct and indirect impacts from climate change.

Include in 3rd paragraph of Section 12.5.6 following additional wording:

Several Government departments will be responsible for preparing sectoral adaptation plans for example the 'Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage' (2019). Local authorities are also tasked with addressing climate change at a local level through the preparation of their local climate change adaptation strategies. Like the NMP, the NAF will be reviewed every 5 years.

Include following link to Section 9.6 (Page 9-14)

....including cross border inter-visibility and interrelationships. Further details in relation to the NIAH can be found at www.buildingsofireland.ie

Include New Policy Objective:

Policy Objective	
BHC XX	To have regard to the Architecture Heritage Protection Guidelines (2011) and the Guidance Notes for the Appraisal of historic Gardens, Demesnes, Estates and their Settings (2006) in the appraisal and description of Historic Gardens and Designed Landscapes.

Additional Text to Policy SS 18 (Page 2-34)

Policy Objective	
SS 18	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.

Additional Text to Policy SS 32 (Page 2-40)

Policy Objective	
SS 32	"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 while maintaining the integrity of the Dundalk Bay Natura 2000 sites'

Reword TOU 10 as follows:

Policy Objective	
TOU 12	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 appraisal of environmental impacts and take full account of the potential for negative impacts on European Sites through the process of Appropriate Assessment.

2. Volume 5 SEA

- Include additional text (in red) in Table 8.2 (New text in red and deleted text in blue with a strikethrough);
~~‘to the loss of/damage to biodiversity in designated sites (including European Sites, Wildlife Sites and Areas of Special Scientific Interest)’~~
‘to loss of/damage to biodiversity in designated sites (including European sites and Natural Heritage Areas).’

Submission No.	LCDP DR577
Submitted by:	Department of Education and Skills (DES)

Summary of Submission:

1. Welcomes many policy objectives included in Chapter 4.
2. The Draft Plan has been considered in the context of projected population growth to 2031 and anticipates additional accommodation if population increase materializes. The objective of compact growth will require expansion to/maximisation of existing schools and therefore a policy objective to this end should be included in the Plan.
3. Specific observations in relating to Dundalk, Drogheda, Ardee & Dunleer.
 - a. Dundalk: RGC with projected 50,000 population by 2031
 - i. Need site for 2 new primary schools and 1 post primary school
 - b. Drogheda: RGC with projected 50,000 population by 2031 (lies in 2 authorities)
 - i. Need site for 1 primary and 1 post primary school
 - ii. The post primary is in addition to Drogheda Educate Together Secondary School, for which a permanent site is sought in south Drogheda (MCC). Other site can be part of the Joint Plan for Drogheda
 - c. Ardee: Considered proposed additional population and requirements could be met at existing schools
 - d. Dunleer: Considered proposed additional population and requirements could be met at existing schools
 - e. Others areas: Requirement for school site reservations at other settlements has not been identified but will be kept under review.
4. Development Management Guidelines: Use of school facilities outside school hours is encouraged and SC 29 is compatible with this. However the wording in 13.10.3 Educational Facilities is problematic as it is premature at planning stage to detail anticipated uses outside of school hours.

Chief Executive's Response:

1. Acknowledgement of the Chapter and the associated policy objectives is welcomed.
2. The Council recognises that the principle of compact growth as promoted at national, regional and local level may require an expansion to and/or maximising use of existing school sites. Therefore, in addition to new school development, the council will support the appropriate development and/or redevelopment of existing schools within the County.

To this end it is recommended that a new policy objective be included and is outlined in the Chief Executive's Recommendation.

3. Regarding the need for additional primary and post primary school sites in both Dundalk and Drogheda, the Draft Plan specifically acknowledges that the planning process can address future requirements for educational facilities through the reservation of specific lands for such uses or through permitted uses within a wide range of other zoning categories, thereby ensuring flexibility to accommodate future needs.

In response to sub-section a. and b.

Louth County Council will continue to work closely with the Department of Education in accordance with the MoU, regarding the proactive identification and acquisition of school sites and in support of the Department's schools building programme. Specifically, Policy Objectives SC 25 and 26 seek to ensure adequate lands are zoned and reserved to establish, expand and improve educational facilities in the County and particularly in areas identified for population increase.

The identification and reservation of appropriate school sites will be further explored as part of the preparation of the Drogheda Joint LAP and the Dundalk LAP. The issue raised regarding the Drogheda Educate Together Secondary School is noted. It is recommended that additional text be included in Section 4.10 and is outlined in the Chief Executive's Recommendation.

In response to sub-section c. and d.

Capacity at existing schools in Ardee and Dunleer to accommodate increased population is noted.

In response to sub-section e.

Continual review of school site reservations elsewhere in the County is also noted.

4. Concerns regarding the wording at 13.10.3 are noted. It is suggested that the section be reworded and is contained in the Chief Executive's Recommendation.

Chief Executive's Recommendation

1. No Change

2. Insert the following new policy objectives

'To maximise the use of and support the expansion of existing school sites in accordance with the proper planning and sustainable development of the area'.

3. Insert additional text (in red) within Section 4.10 Education

'The Department of Education has identified that the two Regional Growth Centres of Dundalk and Drogheda will require additional sites to be zoned over the Plan period to accommodate the following:

- Dundalk: Two new primary schools and one new post primary school
- Drogheda: One new primary school and one new post primary school

The identification and reservation of appropriate school sites will be further explored as part of the preparation of the Drogheda Joint LAP and the Dundalk LAP.

While the reservation of sites for educational use does not in itself guarantee the timely provision of necessary educational facilities, the Council will continue to liaise with the Department of Education and Skills, the Louth Meath Education and Training Board (LMETB) and other stakeholders to assist, where possible, in the development of suitable educational facilities.

Insert the following new policy objectives:

Policy Objective	
SC XX	'To continue to support and promote existing schools serving communities in town and village centres'.

4. Amend wording at the end of section 13.10.3; (additional text in red and deleted text in blue with a strikethrough);

'Where feasible and practicable to do so, full details of all anticipated uses outside of school hours should accompany ~~be provided with~~ the planning application. All such uses outside of school hours shall be agreed in writing with the Planning Authority prior to occupation of the proposed development.

Submission No.	LCDP DR 008, 009, 010
Submitted by:	Louth Meath Education and Training Board (LMETB)

Summary of Submission

1. New primary and post primary school will be needed in the life of the Plan to service Drogheda. 1,000 pupil school requires @ 10acres and a primary would require 6 acres. Hence @ 15 acres zoned for Community/Educational usage, suitably serviced and with adequate road frontage is required.
2. New primary and post primary school will be needed in the life of the Plan to service Dundalk and should be in the south of the town. 1,000 pupil school requires @ 10acres and a primary would require 6 acres. Hence @ 15 acres zoned for Community/Educational usage, suitably serviced and with adequate road frontage is required.
3. There are demands for the establishment of a standalone Gaelcholaiste, which would require in excess of 400 students (for standalone status) which should be centrally located. Dunleer is suggested as a central location.

Chief Executive's Response:

This submission from the LMETB is welcomed. The Draft Plan clearly recognises the importance of educational facilities in developing sustainable communities, and as a driver for economic success and social progress. The Draft Plan states that the Council will continue to work closely with the Department of Education and Skills in support of the Departments schools building programme into the future which is supported in Policy Objectives SC 25 and SC26.

It is considered appropriate that additional text be included in the narrative of Section 4.10 promoting continued liaison with the Department of Education and Skills and the LMETB (and other stakeholders) to assist in the development of suitable educational facilities. The additional wording is outlined in the Chief Executive's Recommendation.

The planning process can address future requirements for educational facilities including a standalone Gaelcholaiste, through the reservation of specific lands for such uses or through permitted uses within a wide range of other zoning categories, thereby ensuring flexibility to accommodate such needs, should they arise. The proposal for locating such a facility within Dunleer can be further explored as part of the preparation of the Dunleer LAP.

Chief Executive's Recommendation:

Insert additional text (in red) in section 4.10;

'The Department of Education has identified that the two Regional Growth Centres of Dundalk and Drogheda will require additional sites to be zoned over the Plan period to accommodate the following:

- Dundalk: Two new primary schools and one new post primary school
- Drogheda: One new primary school and one new post primary school

The identification and reservation of appropriate school sites will be further explored as part of the preparation of the Drogheda Joint LAP and the Dundalk LAP.

While the reservation of sites for educational use does not in itself guarantee the timely provision of necessary educational facilities, the Council will continue to liaise with the Department of Education and Skills, the Louth Meath Education and Training Board (LMETB) and other stakeholders to assist, where possible, in the development of suitable educational facilities.

Submission No.	LCDP DR030
Submitted by:	Environmental Protection Agency (EPA)

Summary of Submission

1. Brief outline of role & function of EPA and approach to land use plans.
2. 13 key actions to be addressed by government to deliver Ireland's long term sustainable development and environmental protection goals are identified and relevant aspects should be incorporated in the Plan to ensure compliance with same:
 - a. Need an Integrated Policy Position for Ireland's Environment
 - b. Full implementation of existing environmental legislation with review of governance on environmental protection across public bodies
 - c. Promotion of clean environment for health/well being
 - d. Systematic change so Ireland becomes climate neutral and a climate resilient society & economy
 - e. WHO clean air guidelines to be adopted into the Clean Air Strategy as targets
 - f. Safeguard nature/wild places for future generations
 - g. Improve water environment & tackle water pollution water quality locally at water catchment level
 - h. Reduce human induced pressures on marine environment
 - i. Move from fossil fuels to clean energy systems rapidly
 - j. Agri-food sector displaying validated performance producing food with low environmental footprint
 - k. Drinking water & wastewater infrastructure must meet needs of society
 - l. Move to circular economy: prevention, reuse, repair & recycle
 - m. Promote integrated land mapping to support decision making on sustainable land use.

3. Transport: Plan should support 'Avoid-Shift-Improve' hierarchy approach to change the transport system so more environmentally friendly. Integrated transport and spatial planning can achieve compact development with support from appropriate policies and objectives.
4. Comments on Plan:
 - a. The Sensitivity Mapping Web tool helps in identifying environmental sensitivities
 - b. Welcomes policies on Greenways & Blueways and advocates these should support rather than replace existing GI or negatively impact on designated European sites. Available toolkits are identified.
5. Environmental Report:
 - a. Monitoring Programme should be flexible, consider cumulative effects, consider positive & negative effects and set out data sources, monitoring frequencies etc. Adverse impacts identified require suitable, effective remedial action is taken.
6. Advises appropriate approach to future amendments to the Plan.
7. On adoption of the Plan a SEA Statement be sent to all environmental authorities consulted during the SEA process & outlines consultees prior to making SEA determination.

Chief Executive's Response:

The Draft Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the NPF and the RSES.

As outlined in the submission, the EPA's 'State of Environment Report *Ireland's Environment - An Assessment 2020* (EPA, 2020)' identifies thirteen Key Messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs). This report is identified in section 11.1.1. Similarly, Section 12.4.4 of the Draft Plan references the UN Sustainable Development Goals. These two documents underpin the text and policy objectives within the Draft Plan, particularly with regard to environment, climate action and sustainable transport.

The Draft Plan takes cognisance of the environmental sensitivities associated with developing tourist infrastructure in the County, such as Greenways and Blueways. To this extent, policy objective TOU 35 has been included in the Plan to consider the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.

Proposals for greenway/blueway development should contribute towards the protection or enhancement of existing green infrastructure and additional text should be included in section 6.3.1 and is outlined in the Chief Executive's Recommendation.

The EPA's Sensitivity Mapping Web tool has been and will be used in undertaking the SEA and preparing the Draft Plan.

The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Programme to be included in the SEA Statement. The cited guidance has been and will be taken into account in undertaking the SEA and preparing the Draft Plan. Proposed material alterations will be screened using a method similar to that used for the Plan.

An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement. The environmental authorities cited in the submission are being consulted with as part of the SEA/Plan preparation process.

Chief Executive's Recommendation:

Insert additional text (in red) at the end of the last paragraph within Section 6.3.1;

"Proposals for greenway/blueway development should contribute towards the protection or enhancement of existing green infrastructure and have regard to the "Connecting with nature for health and wellbeing" EPA Research Report 2020."

Submission No.	LCDP DR017
Submitted by:	Northern & Western Regional Assembly

Summary of Submission:

1. Acknowledges that whilst Louth no longer aligned with the NWRS, it and its Regional Growth Centres are viewed by the Assembly as a strategic partner and key influencer for Cavan & Monaghan. NWRA wants to deliver effective regional development for all regardless of administrative boundaries. A shared sub region with the EMRA is the North-East.
2. Outlines key elements of the NWRA RSES
3. Suggests potential in Louth Plan that would benefit from changes to encompass aims of the NWRA RSES for cohesion between the Eastern and Central Border Region:
 - a. Reflect that Louth is part of the NE functional area comprising 2 regional assembly areas
 - b. Reflect that Dundalk is a significant employment and education base to Monaghan and Cavan.
 - c. Improve narrative alignment between LCC and the NWRA RSES including altering terminology of identified towns
 - d. Broaden narrative regarding Irelands Ancient East to acknowledge collaboration in relation to Destination towns and the exploration of linkages to N and NE.
Additional reference to upgrade of Dundalk to Sligo East/West Road which is key component to inter-regional accessibility.

Chief Executive's Response:

The designation of Drogheda and Dundalk as Regional Growth Centres is an acknowledgement of the importance of the role of these settlements in driving economic growth for the wider region, which includes the border counties of Cavan and Monaghan. Additional text could be inserted into the opening chapter (section 1.1 acknowledging this relationship) and is outlined in the Chief Executive's Recommendation.

Section 2.14.6 and Section 5.8 of the Draft Plan highlight the importance of DkIT in the provision of higher education for the north-east region. It is also recognised that Dundalk is an important centre of employment for the border area. For example policy objective EE 37 supports the role of Dundalk as a Regional Growth Centre and a driver for economic growth in the border area. Section 5.13.1 also highlights the importance of Dundalk as an employment hub in the "north-east of the country". These references include Cavan and Monaghan. It is not considered necessary to make specific references to these counties in the text. Section 5.5.1 of the Draft Plan provides a narrative on Regional Enterprise Plans and highlights the relationship between Louth and adjacent counties in the north-east and border area, with Louth located in the North East/North West Region.

As indicated above, the Draft Plan acknowledges the relationship between settlements in Louth and the wider region and supports continued improvements in connectivity that would strengthen these links. It is not considered necessary to list specific settlements that the County has specific links with. There is a narrative and policy objectives included in the Draft Plan that supports regional growth and connectivity. This will ensure that the Plan will continue to support the links and connections with these settlements.

With regard to the narrative on Ireland's Ancient East additional text could be included in section 6.4.1 that identifies the opportunities to explore the linkages with the destination towns of Cavan and Monaghan that will assist in developing tourism in the border region and is contained in the Chief Executive's Recommendation.

The Council would support any improvements in regional connectivity and would have no objections to the inclusion of a reference to the upgrade of the road link on the Dundalk-Sligo Road in section 7.8 and a new policy objective which are outlined in the Chief Executive's Recommendation.

Chief Executive's Recommendation:

Insert the following additional text (in red) into Section 1.1

Prior to 2015, Louth was part of the Border Region but with the establishment of the three new regional assemblies, the County was incorporated into the Eastern and Midland Region. This represents a shift from viewing Louth in the context of a border County to one more aligned and affiliated with Dublin and the Eastern & Midland Region; the region with the largest population and highest concentration of employment and associated employment opportunities in the country.

The County nonetheless retains links with the border area and counties including Cavan and Monaghan and will continue to support investment and improvement in connectivity and economic investment that will facilitate local and regional development in the border area.

Insert then following additional text (in red) into Section 6.4.1

Ireland's Ancient East was established in 2015 to offer visitors a compelling motivation to visit the east of Ireland and create a new umbrella destination similar to that of the Wild Atlantic Way which has been highly successful. The concept covers coastal counties along the east of Ireland as well as counties in the north east region including Monaghan and Cavan and provides an opportunity for collaboration in the promotion and development of tourism.

Insert the following additional text (in red) into Section 7.8.6

The Dundalk - Sligo Road

This road project is considered a key component of inter-regional accessibility and will result in the incremental upgrade of a specified route linking the regional growth centres of Dundalk and Sligo.

The improvement of this route over the short and medium term will provide an important strategic cross border transport corridor between the north eastern and north western regions where rail infrastructure is absent. The road project is supported by RPO 6.10 of the Northern & Western Regional Assembly RSES.

Insert New Policy Objective MOV 46:

Policy Objective	
MOV 46	To support the progression of the Dundalk-Sligo Road and to continue to work closely with Transport Infrastructure Ireland and other stakeholders in the delivery of this project

Submission No.	LCDP DR702
Submitted by:	Inland Fisheries Ireland

Summary of Submission:

1. Outlines the functions of IFI and clarifies what 'Fisheries' entails. Provides comments on the Plan under the specific headings;
2. Tourism:
 - a. Supports protection & development of angling tourism in the Plan. Supports signposting & information boards.
3. Movement:
 - a. Transport & other infrastructure can have potential negative impacts and rather should protect & conserve the existing environment
4. Natural Heritage & Green Infrastructure:
 - a. Impacts of development on the aquatic environment are numerous unless managed properly. Riparian zones of up to 50m may be required depending on conditions. IFI urges all LA's to address the need for riparian habitat protection and can advise in this regard.

5. Climate Change:
 - a. Impacts of climate change can have negative impact on fish and aquatic habitat. Plan can promote water conservation & water use efficiency which will enhance reliability, restore ecosystems etc. Best practice for water conservation such as rain water harvesting should be promoted.
 - b. Wide scale unregulated water abstraction for crop irrigation may have significant ecological impacts.
6. General: Plan should provide for maintenance and protection of all watercourses and associated riparian habitats.

Chief Executive's Response:

The support for fisheries related tourism is noted.

While it is acknowledged that transport and infrastructure projects have the potential for negative impacts on watercourses, such projects are subject to environmental considerations such as EIA and AA.

The importance of riparian corridors is acknowledged within the Plan. NBG 44 is to protect, maintain, and enhance the natural and organic character of the watercourses in the County, including opening up to daylight where safe and feasible. The creation and/or enhancement of riparian buffer zones will be required where possible. All proposed coastal walkways will be required to comply with the Habitats, EIA and SEA Directives.

Figure 12.2 (Climate Risk Register Summary) notes the risks to inland waterways posed by Climate Change. This includes:

- reduced flow in rivers and streams during heat wave events and drought conditions;
- increased surface run-off resulting in nutrients being washed into rivers, streams, and lakes during extreme precipitation events;
- Changes to river morphology (e.g. bank erosion) caused by increased flow rates during extreme precipitation events.

As such the Plan promotes engagement with the local community and promoting sustainable practices such as water conservation (Section 3.6).

Overall, the Draft Plan acknowledges that the economic, social and environmental well-being of County Louth requires water quality to be of the highest possible standard. To this extent, policy objectives are included which focus on maintaining the highest water quality. Specific policy objectives include ENV15 to ENV 19. ENV 18 is to protect fisheries in all rivers in the County, where appropriate, including relevant species as contained in Annex II of the Habitats Directive.

Chief Executive's Recommendation

Recommendation - No change

Summary of Submission

1. Pinpoints position within the review process of the MCC plan & the opportunity to align policies with LCC in cross-boundary areas. The important role that LCC & MCC play in implementing the EMRA RSES is acknowledged.
2. LA Collaboration & Joint Drogheda LAP
 - a. Welcomes policies supporting Joint LAP, engagement between the two authorities and the forthcoming implementation of a tiered zoning approach and the HNDA.
 - b. Core strategy allocation should only apply pending preparation of the Joint LAP & this should depend on Tiered Zoning Approach to ensure delivery of housing.
 - c. As per the Plan, MCC will monitor and control the number of units granted in Southern Environs of Drogheda prior to adoption of the Joint LAP and suggests similar provision in the Louth Plan in HOU 6.
 - d. Noted that areas are identified as priority for development e.g. North Drogheda. This approach is considered premature with no current agreement on the preparation of the Joint LAP by the two authorities.
This could impact the preparation of the Plan and predetermine the evaluation of alternatives that would form part of the SEA of the Joint LAP. Such reference should be removed and only included when Joint LAP is finalised.
3. Local Transport Plan:
 - a. Welcomes MOV 4 which will be key tenant to the Joint LAP.
4. Green Infrastructure:
 - a. Supports SS 18 regarding GI through Drogheda and its benefits
5. Dublin-Belfast Economic Corridor:
 - a. Welcomes the policies supporting economic development along this corridor including EE 2.
6. Tourism:
 - a. Welcomes recognition of the importance of the Boyne Valley Tourism Plan identifying key projects to stimulate tourism development, bringing the brand to the next level and creating employment
7. Rural Housing Policy:
 - a. The rural housing policy approach adopted in the Plan is supported by MCC (similar approach).
 - b. It has incorporated additional individual requirements to fulfil rural housing needs criteria and considered necessary to address pressures from urban generated housing demands.
 - c. MCC welcomes focus on small towns and villages to prevent their decline (similar to Meath) in addition to the identification of the Level 5 settlements.
8. Brú na Bóinne: Welcomes the continued support and partnership approach between the two authorities.
 - a. Highlights a numerical error in relation to cross reference between policy and DM standards.

- b. Specific reference should be made to protect the OUV of the UNESCO World Heritage Site of Brú na Bóinne.
 - c. Include specific objective to support the implementation of the Brú na Bóinne Management Plan 2017.
9. Cross Boundary Infrastructure Requirements:
- a. Request LCC collaborate with MCC and IW in identifying and developing cross county boundary water services proposals.

Chief Executive's Response:

The Council welcome that Meath County Council supports the future sustainable growth of Louth. The acknowledgement by Meath of the policy objectives in the Draft Plan that will assist in the creation of more sustainable communities, in addition to the identification of cross boundary projects and a closely aligned policy approach on various issues such as transport, tourism, and town and village centre regeneration and development highlights the areas of common interest between the counties. The commitment Meath has indicated they are giving to the preparation of a Joint LAP for Drogheda is also welcomed.

The suggestion that that population and housing allocation for Drogheda should only apply pending the preparation of the Joint LAP is noted however Louth County Council does not agree with this approach. The RSES has allocated Drogheda a target population of 50,000 by 2031 and on page 64 indicates that the distribution of this population should generally be in accordance with existing population levels in each local authority area. This provides a sufficient platform for the distribution of population between the two Local Authorities. The population and housing projections for Drogheda in the Draft Plan have been calculated on this basis.

An Infrastructure Assessment and Land Use Evaluation was carried out for all settlements in the County as part of the preparation of the Draft Plan. This has identified areas in Drogheda where there are infrastructure constraints and capacity issues. The Council agrees with MCC that a more detailed analysis of the zoned lands will be carried out as part of the preparation of the LAP and appropriate phasing arrangements will be put in place with regard to the build out of lands in the Northern Environs of Drogheda.

The suggestion to amend HOU 6 with regard to monitoring residential activity in the Northern Environs of Drogheda is noted. This is not considered necessary. There are a large number of extant permissions in the Northern Environs of Drogheda. It is unlikely that the majority of these permissions will be implemented. Taking account of the fact that the build out of these lands is dependent on the delivery of significant transport and water services infrastructure the Council will be in a position to manage development activity in this location, pending the preparation of the LAP.

Section 2.13 of the Draft Plan sets out the settlement strategy for Drogheda including a context and growth strategy. There is also a narrative around other issues including regeneration economy, the heritage quarter, and movement. A section is included on the northern environs due to the extent of lands associated with the development of this part of the town. The Council does not agree with the assertion that the reference to the northern environs would be premature pending the preparation of the Joint LAP. It is important that in the interim period pending the preparation of the Joint Plan that there is a coherent strategy in place for the growth and development of the town.

The development of the northern Environs of Drogheda and the construction of the PANCR is a central element of the long term development strategy for Drogheda. The construction of the PANCR is identified in the RSES as a critical piece of enabling infrastructure with RPO 4.12 supporting the future development of the road. Taking account of the fact that the construction of this road is included in regional policy it is not considered premature to include the lands associated with the development of the road in the Draft Plan. As previously indicated, a more detailed analysis of the phasing of these lands will be carried out as part of the preparation of the LAP.

The identification of a typographical error when referring to section 13.26.9 instead of 13.17.10 in policy objective HOU 46 and section 13.9.40 are welcomed. This will be amended accordingly and is contained in the Chief Executive's Recommendation.

There would be no objections to including additional text in section 13.17.10 highlighting the need to protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne and is outlined in the Chief Executive's Recommendation.

In relation to cross-boundary infrastructure the Council recognise of early and regular engagement with adjacent local authorities in the progression of such projects and will continue to engage with Irish Water and Meath County Council in this regard.

Chief Executive's Recommendation

- Amend the reference to section 13.26.9 in policy objective HOU 46 and section 13.9.40 to 13.17.10: (additional text in red and deleted text in blue with a strikethrough);

Policy HOU 46

To require applications for one off rural housing to comply with the standards and criteria set out in section 13.2 of Chapter 13 Development Management Guidelines 'Housing in the Open Countryside' or section ~~13.26.9~~ 13.17.10 if the site is located within the Brú na Bóinne UNESCO World Heritage Site, the Tentative World Heritage Site of Monasterboice, or the Battle of the Boyne Sites.

13.9.40 Criteria for Development in Areas of Significant Cultural Value

Section ~~13.26.9~~ 13.17.10 sets out specific criteria that is required to be considered for developments that are in proximity to the Brú na Bóinne UNESCO World Heritage Site, the Tentative World Heritage Site of Monasterboice, and the Battle of the Boyne Battlefield Sites.

- Insert the following text into at the beginning of section 13.17.10
Specific criteria for the assessment of applications in the Brú na Bóinne UNESCO World Heritage Site, the Tentative World Heritage Site of Monasterboice, and the Battle of the Boyne Sites due to the outstanding cultural value and significance of these sites. When preparing an application in any of these locations the following shall be taken into account.

Submission No.	LCDP DR806
Submitted by:	Monaghan County Council

Summary of Submission

1. Broadly supports the objectives and policies and makes specific comments as outlined below:
 - a. Whilst supporting MOV 31, it requests an objective be included to progress the proposed Carrick-Kingscourt-Nobber-Navan Greenway
 - b. Concurs with Objectives MOV 39 & MOV 40 which aligns with policy in the Monaghan Development Plan.
 - c. Given the significant inter relationship between the two counties and the wider North East Region and the Eastern Economic Corridor, there should be stronger reference in Louth's Plan, consistent with the recognition afforded in the NWRA RSES.

Chief Executive's Response

The Council welcomes the broad support from Monaghan County Council to the policy objectives set out in the Draft Plan. The importance of a co-ordinated approach in delivering critical infrastructure that is of national and regional significance is recognised and therefore it was important that there was a close alignment in the policy contained in the Monaghan and Louth CDP with regard to the N2 Upgrade from Ardee to Castleblayney.

The Draft Plan recognises the social and economic benefits of investment in sustainable modes of transport including greenway infrastructure. Whilst the Carrickmacross-Kingscourt-Nobber-Navan Greenway will not pass through County Louth the possibility of extending this into Country Louth will be explored during the lifetime of this Plan. It will be an important piece of infrastructure for residents in the wider region and also has the potential to provide economic spin offs that would attract visitors to the region. However a policy objective supporting the progression of this project is not considered necessary.

It is recognised that the catchment of the Regional Growth Centres and Dundalk in particular extends into Monaghan. The Council would support the continued improvement and strengthening of connectivity between Louth and the border counties in order to support and facilitate economic development in the border area. Policy Objective EE10 supports economic growth and investment in both the EMR and NWR Assembly areas. Additional text could be inserted into chapter 5 within section 5.7 further emphasising the links between Louth, Monaghan, and Cavan and is outlined in the Chief Executive's Recommendation.

Chief Executive's Recommendation:

- Insert the following additional text (in red) in Section 5.7
The NPF and RSES highlight the importance of this corridor in supporting economic growth and maintaining economic competitiveness. Opportunities to strengthen links along this corridor and in particular, the cross border links between Drogheda-Dundalk-Newry, have been identified as a potential driver for economic growth. The international dimension of this corridor has added significance in the context of the UK withdrawing from the EU.
In addition to the cross-border links, there is also a strong connection between Louth, Meath, Monaghan, and Cavan in the provision of services, employment, and education, which, creates a wider cross-border network of counties and settlements in the north-east of the country.

Submission No.	LCDP DR281
Submitted by:	Newry, Mourne & Down District Council

1. Acknowledges step change in this Plan relative to previous plans relating to national and regional policy, inclusion of the entire County, pending preparation of the Dundalk and Drogheda UAPs and movement from Border Region to the Eastern and midland Region, wherein the RSES has designated Dundalk and Drogheda as RGC's.
2. Welcomes acknowledgement of importance of Dublin-Belfast corridor and cross border collaboration.
3. Its growth strategy with focus on the two RGCs (including compact growth) and need to manage urban generated housing is noted.
4. Welcomes capitalization of strategic location on the Dublin-Belfast corridor, to drive synergies between the north and south, recognition of the MoU, whilst recognising the uncertainties of Brexit.
5. Acknowledges support for sustainable tourism and the reference to the Narrow Water Bridge Project which would be of historical significance and facilitate improved access to the scenic beauty both north and south of Carlingford Lough.
6. Welcomes continued commitment to sustainable transport and developing the network of Greenways especially the Great Eastern Greenway.
7. Notes the protection of the natural and built environment and the GI Strategy.
8. Notes the impact of climate change, SuDS, Flood Risk Management and promotion of energy efficiency.

9. Welcomes further discussion in the future regarding our shared coast.
 10. Welcomes measures to transition to a low carbon and climate resilient County but highlights need to consider potential impacts of renewable energy resource applications given the transboundary potential impacts.
 11. Acknowledges Plan has comprehensively considered the impacts of climate change.
- Plan is not in conflict with the Draft Plan Strategy for the Newry, Mourne, and Down Local Development Plan 2030 currently in preparation.

Chief Executive's Response:

The Council welcomes the submission from Newry, Mourne & Down District Council and acknowledges its recognition of the step change in the current Plan relative to its predecessors, and of the new national and regional policy framework, including the relocation of Louth into the Eastern and Midland Region.

The Council welcomes the large scale and rounded support expressed in the submission for continued co-operation regarding the many cross border issues including *inter alia*; the Dublin-Belfast Corridor, driving synergies between north and south, sustainable tourism, recognition of the MoU, Greenway networks, Brexit uncertainties, the shared coast, sustainable transport, and comprehensive consideration of Climate Change.

In relation to impacts of renewable energy resource applications the Council is committed to fully considering all potential impacts of such applications.

The Council very much welcomes the fact that the Draft Plan is not considered to be in conflict with the Draft Plan Strategy for the Newry, Mourne, and Down Local Development Plan 2030 currently in preparation.

Chief Executive's Recommendation:

No Change

Submission No.	LCDP DR216
Submitted by:	An Taisce

Summary of Submission:

Outlines key objectives of submissions and welcomes that many of the goals are contained within the Plan. Submission divided into 9 sections as below.

1. Strategic Objectives & Climate & Biodiversity Emergencies:

- a. Commends focus on climate mitigation and adaptation policies in Ch. 8. Strategic Vision and Objectives fails to recognise these challenges. Policy objective CA1 should form a more central part of the vision and objectives.
- b. Charts in Ch. 12 detailing climate targets & relevant plan objectives are welcome and should be better integrated throughout the Plan. Considered that mitigation needs greater emphasis in the Vision and SO's.
- c. Plan should reflect the Supreme Court Judgment in relation to National mitigation Plan. (S 12.5.5)
- d. Omission of Sustainable Development Goals is noted and should be given greater prominence in the Vision and SO's.

2. Sustainable Settlement & Transport:

- a. To achieve compact development, reduce transport emissions and improve quality of life the Plan must address population growth, encourage modal shift and consolidate urban forms supported by investment.
- b. Critical that development be to compact serviced locations using a sequential approach with existing infrastructure capacity.
- c. Plan must be guided by existing social and physical infrastructure including realistic prospects for addressing capacity constraints and land should not be zoned if no prospect of providing physical infrastructure.
- d. Welcomes commitments to compact growth, development close to public transport etc.
 - i. Suggests implementing the 7 Location Test Standards as per the NSS (2002) for evaluating proposed housing development.
- e. Ireland has failed to achieve modal shift envisaged in Smarter Travel 2009 and elsewhere. Therefore the policies in the Plan promoting modal shift are welcomed.
 - i. Suggests targeted and timed plans to ensure implementation of the policies is needed.
 - ii. Welcomes policies to reopen/develop train stations.
 - iii. Explicit objective that sufficient public transport, safe cycling, pedestrian infrastructure provided before or in tandem with all new residential development
- f. Council needs to address failure to provide for modal shift in County especially in light of the Programme for Government
- g. Further investment in motorways etc. is mispending of money. Investment in Louth should support public transport and cycling infrastructure.
- h. Welcomes the Drogheda Joint UAP

3. Economy & Employment:

- a. Welcomes commitment to Town Centre's First Policy for Dundalk and Drogheda and should be extended to Ardee and Dunleer and should strengthen policy to prohibit out of town retail
- b. Water Quality trends in Ireland remain problematic with increased nitrate and phosphate levels. Agriculture is a key driver of these declines as it is of ammonia emissions.
 - i. EE 58: Only support if can show not to exacerbate deterioration of water quality, complies with Habitats Directive & doesn't further increase emissions
 - ii. EE 59: Promote development of sustainable agriculture through production of vegetables, nuts, pulses etc.
 - iii. ENV 22: Replace 'encourage' with 'require'
- c. New objective: *'LCC will implement the objectives and targets at county level of the EU 'A Farm to Fork Strategy' published May 2020. The Council will also implement the targets of the 14 point EU Nature Restoration Plan in the 'EU Biodiversity Strategy for 2030 – Bringing nature back into our lives'.*
- d. New objective for agriculture: *'Ensure that agriculture development is in compliance with the EU 'A Farm to Fork Strategy' and the 14 point EU Nature Restoration Plan in the 'EU Biodiversity Strategy for 2030 – Bringing nature back into our lives'.*
- e. There is no business case to expand the berthage capacity at Drogheda or Greenore ports. Development proposed at Breamore (off County Meath) is unjustified and fails to meet any location suitability test for a new port development.

4. Sustainable Tourism:

- a. Objective of An Taisce to promote longer stays, reduce car usage and promote greenway cycling routes, walking, hiking etc. Welcomes objectives of the Plan.
 - i. Plan could better support sustainable tourism development by explicitly integrating sustainable transport into tourism objectives with the goal of increasing car free and longer stay.
- b. Welcomes policies on Greenways
- c. Need for Narrow Water bridge is not justified especially in light of operating ferry.

5. Infrastructure & Environment Management: Welcomes the range of policy objectives.

- a. Define 'unacceptable impact' in ENV 15 and require consideration of compliance with the provisions of the WFD and RBMP in granting permissions
- b. Private wastewater systems are a concern and Plan should ensure adequate provision of serviced sites in proximity to water/wastewater infrastructure to allow connection
- c. New objective to *Promote the changeover from septic tanks to public collection networks in all cases where this is feasible.*
- d. Plan must ensure provision of bioenergy is accomplished in sustainable manner.

- i. Welcomes development of biogas through anaerobic digestion but only where sustainability of resource is justified e.g. feedstock sources
- ii. Anaerobic digestion predicated on increased grass/energy crop production should not be permitted as requires increased use of fertilizer.
- iii. Existing waste streams for energy provision are more sustainable
- iv. Slurry use for bioenergy shouldn't drive bovine agriculture intensification
- v. Sustainability of biogas's end use must be assessed and only granted where not mixed with fossil fuel as it is then not sustainable.
- vi. Amend IU 62 to include 'Biogas development will only be supported where it can be demonstrated that the feedstock source is sustainable and where the biogas end product will not be mixed with fossil gas'.
- vii. Amend IU 60 to include 'The sourcing, sustainability and impacts of the proposed biomass require full assessment.
- viii. The import of biomass for energy should be prohibited
- ix. Remove objective to develop further gas supplies
- x. Differentiate between native forestry planting and planting of other species with greater emphasis on native broadleaf.
- xi. Include objective for strict enforcement against unauthorised quarrying and compliance with conditions and apply Section 35 (past failures to comply)
- xii. New objective 'The extraction and use of peat for horticulture is not to be permitted'.

6. Marine Spatial Planning & Coastal Issues:

- a. Notes many objectives prioritise economic growth over protection. Must recognize a healthy ocean ecosystem is fundamental for economic and social benefits.
- b. All coastal and marine objectives should be subject to environmental assessments and controls that prioritise ecosystem health.
- c. Require explicit commitment to ecological protection and an ecosystems approach in the in the objectives relating to shellfish waters and aquaculture is required.
- d. New objective requiring compliance with the marine Strategy Framework Directive with particular reference to achievement of Good Environment Status.
- e. Advancement in wind turbine technology needs reconciliation with biodiversity. Bird Watch Ireland is trialling a bird sensitivity mapping tool that could aid developers in investigating potential risk of impacts and include suitable mitigation measures.
- f. New Policy: requiring the use of a Seabird Sensitivity Map in the early stages of planning.
- g. Welcomes objectives curtaining further coastal development in areas susceptible to erosion & other climate change impacts.

7. Natural Heritage, Biodiversity & Green Infrastructure:

- a. Agriculture and development are the two primary threats to EU Protected habitats and Species.
- b. Policies aimed at biodiversity protection and enhancements are welcomed and implementation must be upheld during the planning process.
- c. Recommend implementation of the 14 points in the EU Biodiversity Strategy 2030.
- d. Greater landscape protections are required especially in coastal areas and the Boyne Valley World Heritage Site

8. Built Heritage and Culture:

- b. Plan should ensure effective promotion of Architectural Heritage including ACAs and PS.
- c. Include Policy for monitoring Buildings at Risk and use S59 of the P&D Act to serve notices of endangerment on property owners.

9. Implementation and Monitoring:

- a. Policy and practice results often diverge. Plan should move from objectives to targets, actions and measures in the Plan. Success can only be judged against quantifiable and implementable criteria subject to ongoing monitoring.

Chief Executive's Response:

The Council welcomes the submission from An Taisce. The format of the response is as per the layout and division of the submission above.

1. Strategic Objectives & Climate & Biodiversity Emergencies:

The Council notes the objectives of the submission and welcomes acknowledgement of incorporation of many of these goals into the Draft plan in addition to the increased focus on climate mitigation and adaptation in Chapter 12 and the policies in Chapter 8.

Support by An Taisce for the numerous policy objectives in the Draft Plan is welcomed by the Council and suggestions regarding its Strategic Vision are noted. In response, it is considered appropriate to make an amendment to the Strategic Vision with the inclusion of the additional text which is included in the Chief Executive's Recommendation.

While Chapter 12 specifically addresses Climate Change, the Council considers that the principles of climate change have been incorporated into and are intrinsic to both the narrative and the policy objectives of the Plan.

In response to the decision taken by the High Court on 31/07/2020 to quash the National Mitigation Plan (NMP) 2017 all reference to the NMP within the Plan will be omitted.

In regard to the UN Strategic Development Goals (SDG's) and their alleged omission from the Draft Plan, the Council would argue there is direct reference to the said goals in Chapter 1, 2 and 12 of the Draft Plan but indirect reference throughout the Draft Plan.

This is due to the fact that there is significant alignment between the UN SDG's and the National Strategic Objectives (NSO's) of the National Planning Framework (NPF). The ambition of the NPF is to establish a single vision for the Country in accordance with these NSO's of which there are 10 identified and all of which have been instrumental in formulating the strategic direction and policy objectives of the Draft Plan in areas such as clean energy, sustainable cities and communities, economic growth, climate change, reduced inequalities and innovation and infrastructure as well as education and health.

Notwithstanding this, it is suggested that additional text is included in Section 2.2.1 which is outlined in the Chief Executive's Recommendation.

2. Sustainable Settlement and Transport:

There is a strong emphasis in the Draft Plan on creating more compact settlements where walking and cycling is a viable alternative to the private car. As part of the preparation of the Plan an Infrastructure Assessment and Land Use Evaluation was carried out identifying any potential infrastructure constraints in each settlement. This formed part of the evidence base that informed the growth strategy in each settlement.

With regard to investment in sustainable transport projects the Council will continue to work closely with the National Transport Authority in identifying and delivering projects that will make walking, cycling, and public transport a viable alternative to the private car. Improvements to public transport services in rural areas will also be progressed through the implementation of the 'Connecting Ireland' rural mobility plan currently being prepared by the NTA.

Whilst modal shift and sustainable transport are central elements of the Draft Plan it is also recognised that investment in road infrastructure is also required in order to improve connectivity and support balanced economic development. In this regard the Draft Plan strongly supports the progression of the projects set out in section 7.8 (Strategic Road Projects) of Chapter 7.

3. Economy and Employment:

Policy objective EE68 is a general policy objective that supports the town centre first approach. As part of the Local Area Plans for Ardee and Dunleer a more detailed examination of town centre renewal potential can be carried out.

In relation to out of town retail it is considered that the narrative in section 5.20 in addition to the supporting policy objectives and the Retail Strategy in Volume 3 sufficiently address this issue. In addition any application for such a development will be assessed against the sequential approach as set out in the Retail Planning Guidelines.

The Draft Plan recognises the challenges facing the agricultural industry and the requirements to adapt and change farming practices to deal with the implications of climate change. In addition to policy objective EE 58 there are also specific policy objectives in chapter 11 with regard to compliance with the Nitrates Directive and the pollution of water bodies (policy objectives EE 20-22).

With regard to farm diversification submission no.294 (Fáilte Ireland) recommends the inclusion of additional text in section 5.19.2 'Diversification'.

With regard to the EU Farm to Fork Strategy it is understood that member states will only be required to implement some of the actions. The Draft Plan will support the implementation of any actions that Ireland is required to implement. Additional text can be inserted into section 5.19.1 in this regard. The implementation of the EU Biodiversity Strategy as it relates to agriculture will be managed through the Common Agricultural Policy. It is understood that the detail of how this Strategy will be implemented in Ireland is yet to be finalised. Additional text referring to the Strategy will be set out in section 5.19.1 and is detailed below in the Chief Executive's Recommendation.

Ports have an important role in enabling economic growth and providing international connectivity. This Plan recognises that the Port facilities at Drogheda, Greenore, and Dundalk are an important economic resource and will support the expansion of these facilities subject to the appropriate environmental considerations.

4. Sustainable Tourism

- a. The Plan strongly supports sustainable tourism development within the County. This is underpinned within TOU 17, TOU 18, TOU 34 and TOU 35. The Plan also includes extensive detail within section 6.3.1 on Greenways - Walking and Cycling Routes and associated supporting policy objectives.
- b. Support for policies in support of Greenways is welcomed.
- c. The National Development Plan provides for investment to support the ambition for development of the border region specifically including the Narrow Water Bridge Project. This is supported in the Draft Plan (YOU 19 and MOV 45) and recognised as being of immense symbolic and historic significance. It will; facilitate improved cross-border access, enhance tourist and leisure potential of the region, promote interaction between communities north and south of the border and encourage a modal shift including encouragement of pedestrian and cyclist activity.

5. Infrastructure & Environment Management

- a. Although 'unacceptable impact' cannot be clearly defined within the context of ENV 15, the said policy objective states that this will be within the realm of environmental objectives within the WFD and the recommendations of the RBMP.
- b. In rural areas, the main method of sewage disposal is by means of private wastewater systems, which are subject to compliance with associated strict policy objectives (IU 15-IU 17). In relation to the provision of serviced sites, the Council in the Draft Plan supports the development of 'New homes in Small Towns and Villages' initiative advocated in RPO 4.78 of the RSES. This initiative will involve a coordinated approach between the LCC, Irish Water and local communities in the provision of serviced sites in rural villages and is supported in Policy Objective SS 56 and HOU 39. The Council also recognises the need to encourage close collaboration with other infrastructure providers including electricity, telecommunications and broadband.

- c. In relation to a changeover from septic tank to public collection network, the Council draws attention to IU 12 which requires that all development taking place within an area served by a public wastewater treatment system connects to that system.
- d. The issues raised in relation to Anaerobic Digestion and Bioenergy are addressed collectively hereunder. The Draft Plan recognises the range of new and developing technologies that can contribute to minimizing greenhouse gas emissions, providing a secure and stable energy supply and securing a greater proportion of our energy from renewable sources. The Council supports the concept of generating renewable energy at a local level and recognises the advantages and supports anaerobic digestion and Bioenergy.

Louth County Council is cognisant of the National Policy in relation to Anaerobic Digestion, as currently expressed in the governments Climate Action Plan 2019 (and specifically Action 69 which expressly supports the use of domestic crops such as grass to fuel these). It is considered that the wording of Policy Objectives 60 and 62 is acceptable and appropriate and to this end it is not proposed to amend the wording or include any additional policy objectives in this regard. IU 67 is in line with government policy and it is not proposed to amend the wording to same.

ENV 32 specifically identifies a preference for native species in relation to forestry and forestry related development.

In relation to the extractive industry, the Plan states that as part of the assessment process, due regard will be given to the Department of Environment Heritage Local Government (DEHLG) publication “Quarry and Ancillary Activity Guidelines” (2004). Unauthorised activity is addresses by the Enforcement Section of the Planning Department, in accordance with statutory requirements.

6. Marine Spatial Planning & Coastal Issues:

Marine Spatial Planning is addressed within Chapter 11. While the policy objectives within the chapter focus on the sustainable development of the coastal and maritime areas of the County, it is also expressly stated within ENV 47 and ENV 48 that the policies and objectives set out within the National Maritime Spatial Plan to support the effective management of marine activities and more sustainable use of our marine resources will be implemented. Similarly it is a policy objective to support and accommodate any change to the marine spatial planning system which is proposed under the Marine Planning and Development Management Bill 2019 (or any subsequent Bill) once enacted into law.

7. Natural Heritage, Biodiversity & Green Infrastructure:

The importance of Natural Heritage and Biodiversity is acknowledged in the new standalone chapter dedicated to this topic and in the narrative and robust policy objectives pertaining thereto. Louth County Council is currently in the process of finalising the Louth Biodiversity Action Plan. The Draft Plan contains vigorous policy objectives protecting and conserving the designated European 2000 Sites in the County, protecting biodiversity value of non-designated sites, and protecting proposed Natural Heritage Areas and Sites of Geological Interest.

The recognition of these policy objectives by An Taisce in the Draft Plan is welcomed and the Council will ensure their implementation in the planning process at all levels. In relation to the coastal areas of the County and the Boyne Valley World Heritage Site, the Council is of the opinion that the policy objectives pertaining thereto are sufficiently robust for the protection of these landscapes. In relation to the EU Biodiversity Strategy 2030 please see response in Item 3 above.

8. Built Heritage and Culture:

The Council considers that the narrative and supporting policy objectives relating to the built heritage robustly support and promote Architectural Heritage in the County including both Architectural Conservation Areas and Protected Structures. Indeed Built Heritage and Culture has been designated a standalone Chapter in this Draft Plan in recognition of the County's architectural heritage as an irreplaceable resource and valuable expression of our past, and whose sustainable appropriate maintenance and reuse has economic, social and environmental benefits.

Regarding Protected Structures there are very specific, numerous and all-encompassing policy objectives providing guidance and ensuring the protection of the structures and their settings particularly BHC 15-BHC25. In relation to Architectural Conservation Areas, hereto the Draft Plan is vigorous in the recognition, protection and guidance relating to these ACA's which is evident in policy objectives BHC 26-BHC 32.

Monitoring Buildings at Risk, the Buildings at Risk Register and the service of S59 notices are conducted by the Enforcement Section of the Planning Department, in accordance with statutory requirements. The Draft Plan does however in Policy Objective BHC 25 specifically seek to support owners with the repair and conservation of Protected Structures particularly through available funding streams. Louth County Council administers the grant schemes available from the Department through the Built Heritage Investment Scheme (BHIS) and the Historic Structure Fund (HSF). These represent a significant boost to the preservation of Ireland's unique built heritage and will support owners of protected structures from small-scale, labour-intensive projects such as essential repairs to large-scale projects such as repair to roofs, to conserve, repair and safeguard the historic built environment.

9. Implementation and Monitoring:

It is important to note at the outset, that in the implementation of the Plan, all policy objectives will be rigorously applied and all successful applications for development shall be in accordance with the policy objectives of the Plan and the proper planning and sustainable development of the area. With regard to monitoring, the council will fully accord with all statutory requirements and in particular Section 15 of the Planning and Development Act 2000 (as amended) whereby it is a duty of the Planning Authority to secure the objectives of the Development Plan and to prepare a Chief Executive report no later than 2 years from the Plan adoption, for the Elected members on the progress achieved in securing these objectives. The Council will also fully comply with any further implementations and monitoring requirements as arise and as specified by the Department or the OPR.

Chief Executive's Recommendation

1. Insert additional text (in red) into the Strategic Vision Section 1.6;
'Promote County Louth, in particularly the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences, provision of communities, **while transitioning to a low carbon and climate resilient society** are **all** to the highest standards'

Remove all reference to the National Mitigation Plan (NMP) within the Plan.
This includes the omission of Section 12.5.5 within Chapter 12.

Insert the following additional text (in red) into Section 2.2.1: (additional text in red and deleted text in blue with a strikethrough)

'The NPF identifies a set of goals expressed as National Strategic Outcomes (NSO's), which underpin the overarching vision for the Country (**See Figure 2.1**). These NSO's are significantly aligned with the UN Sustainable Development Goals ~~and are detailed in Figure 2.1~~ **outlined in Chapter 12 (Figure 1) in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.**'

2. No Change
3. Insert the following additional text (in red) in section 5.19.1:
The agriculture industry is facing challenges which may have significant impacts on profitability of farms. Irish farms are heavily dependent on the UK as an export market and the uncertainty surrounding any trade agreements associated with Brexit brings serious concerns to farmers in relation to prices, potential tariffs and the associated higher operating costs associated with this. In addition the industry is coming under pressure to play a greater role in climate change and the reduction of carbon emissions. This may require changes to farming practices which may result in higher costs. **The EU Farm to Fork Strategy and EU Biodiversity Strategy 2030 are key policy documents in the development of sustainable agriculture and the protection integration and management of wildlife habitats.** This Draft Plan will continue to support the agriculture industry and will promote any changes to farming practices that will adapt to climate change and provide more sustainable methods of production.
4. No Change
5. No Change
6. No Change
7. No Change
8. No Change
9. No Change

Submission No.

LCDP DR080

Submitted by:

Geological Survey Ireland

Summary of Submission

1. **Geoheritage:**
 - a. Commends inclusion of policies in the Plan. Listing CGS in the Plan provides protection to the sites and allows the democratic process of public consultation with local community buy into the process.
In relation to any site, early consultation is best to identify potential issues relevant to a particular site.
2. **Culture & Tourism:**
 - a. Welcomes relevant policies included in the plan
 - b. Geology is a growing part of Irish tourism. LCC encouraged using the geological audit information, making it easily available to the public.
 - c. Geology should be part of any tourism initiative introduced.
3. **Groundwater:**
 - a. Welcomes relevant policies included in the plan
 - b. Regarding Flood Risk Management recommends the GWFlood Project and its tools to benefit the Plan in relation to groundwater flooding.
 - c. Need to improve monitoring capacity of groundwater levels in Ireland so potential impacts of climate change can be monitored and assessed. GSI has established the GWClimate to aid in this.
4. **Geological Mapping:**
 - a. Encourages the use of data referenced in the SEA to inform the Plan
5. **Geohazards:**
 - a. Welcomes references to data within the SEA
6. **Natural Resources:**
 - a. Welcomes the policies of the Plan
 - b. Recommends if a CGS is in a quarry, or sand/gravel pit that they be included in Policy ENV 44. The Geoheritage Programme promotes a partnership between geological heritage and active quarrying.
7. **Marine and Coastal Unit:**
 - a. Recommends the use of the Marine and Coastal Unit datasets to benefit policies in Chapter 11.
8. **Coastal Vulnerability Index:**
 - a. Currently being undertaken for the east coast and will offer easy visual representation of sensitive areas.

Chief Executive's Response:

1. The Council notes the comments of the GSI and welcomes support for the policy objectives of the Plan relating to County Geological Sites (CGS) and the protection thereof.

The Council considers that the identification of CGS's within the Plan, their corresponding mapping and associated policy objectives collectively facilitate and promote early consultation regarding any proposed development of potential issues relevant to the site.

2. The Draft Plan references Geology in relation to tourism specifically within Section 6.2.8 Mourne-Cooley-Gullion Geotourism Project. Given that this is the principal area for geology related tourism in the county, it is considered that this reference is sufficient.
3. The availability of GW Flood and GW Climate tools are noted.
4. It is acknowledged that the Bedrock mapping and Quaternary and Physiographic mapping datasets have been used in preparation of the SEA.
5. As above, it is acknowledged that GSI's Landslide Events and Landslide Susceptibility datasets have been used in preparation of the SEA.
6. The recommendation to include County Geological Site (CGS) within ENV 44 is noted and is contained in the Chief Executive's Recommendation.
7. The datasets mentioned in relation to marine and the coast were utilized in the preparation and formulation of policies within Chapter 11.
8. The preparation of the Coastal Vulnerability Index (CVI) is noted.

Chief Executive's Recommendation

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change
6. Amend policy ENV 44 to include the following text (in Red);
To ensure that the extraction of stone and mineral materials is carried out in a manner that is sustainable and does not significantly impact on the following areas:
 - Existing and proposed European Sites;
 - Other areas of importance for the conservation of flora and fauna;
 - Areas of significant archaeological potential;
 - In the vicinity of a recorded monument;
 - **County Geological Site (CGS);**
 - Sensitive Landscapes;
 - World Heritage Sites, or
 - Tentative World Heritage Sites
7. No Change
8. No Change

Summary of Submission:

1. Purpose of submission is to enhance partnership approach and assist in formulating policy for the enhancement of tourism in the County and Region.
2. The submission is divided into 2 Sections. Section 1 relates to 'Commentary on the Draft Plan'. Herein, a summary of each chapter as it relates to tourism is provided and suggested improvements referenced. Precise details of recommendations are provided in Section 2 which is 'Proposals for the Draft Louth County Development Plan'.
3. Proposals for the Draft Louth County Development Plan:
 - a. Chapter 2: Should include reference to tourism (S 2.4.4). Recommends a specific Strategic Objective on Tourism as a key economic driver and suggests the following new policy: *'Support and promote tourism in the county as a key economic driver in a sustainable manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county's natural environment'*.
 - b. Chapter 5: Tourism can play a significant role in the Rural Economy. Diversification can supplement rural incomes and add to richness of area. Farm based enterprise should be facilitated and small scale tourism entrepreneurship can provide a boost. Policies facilitating supporting infrastructure e.g. toilets/parking etc. supports tourism and GI. Suggests following new policy: *'Promote the sustainable diversification of the rural economy through the promotion of farm or rural resource related enterprises such as agri-tourism, artisan food and drink, open farms/pet farms, equestrian, forestry recreation or creative industries subject to normal planning and environment criteria. The scale of the facility should be appropriate to the rural character of the area.'*
 - c. Chapter 6: Welcomes the objectives in the Plan.
 - i. Recommends the following text insertion: *'Tourism is one of the largest and most important sectors of the national economy, providing employment for approximately 260,000 people, an economic contribution of €7.8 billion (excluding carrier receipts), and exchequer revenue of €1.8 billion, which helps fund other key public services. With regard to County Louth, Fáilte Ireland's figures indicate that 1% of overseas visitors overnight in Louth generating a similar share of revenue'*.
 - ii. Requests inclusion of map, similar to Figure 3-1 Core Strategy to illustrate tourism strategy in Louth and include: nodes of tourism activity (existing and proposed), key assets, transport links between nodes and identified routes, strategic tourism centre's (principal towns), sensitive environments, areas of unrealised tourism potential and use of branding e.g. Irelands Ancient East.

- iii. Insert a section on Accessible Tourism. Biggest gap relates to consumer focused Accessibility Information. Louth could benefit from a one stop shop for information on its accessibility as a tourism destination in an Accessibility Guide. New policy wording proposed as follows:
 - *'To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability'.*
 - *'It is an objective of the Council to support the provision of accessible tourism'*
 - *'To ensure all projects and improvements will adopt the principles of Universal Design'*
 - *'To undertake an Accessibility Audit within the lifetime of the Development Plan to inform Accessible Tourism priority investments at key tourism hubs'.*
- iv. Requests an objective supporting future Destination Experience Development Plans and collaboration with Fáilte Ireland and others to ensure successful implementation. Proposed new Policy wording: *'To support and work with Fáilte Ireland on the development and implementation of Destination Experience Development Plans'.*
 Also to reword existing policy TOU 24 to read: *'To engage with Fáilte Ireland to deliver the implementation of the Ancient Destination Development Plan 2020-2024 within County Louth'.*
 Additional wording to Policy TOU 35 as follows: *'It is a policy of the Council to identify any deficits in existing infrastructure required for tourism development and to support upgrades where necessary'.*
- d. Chapter 7: Identify towns and villages are important attractions in themselves and will increase visitor dwell time. Reference should be made to Covid-19 here. Cycling and walking has increased dramatically and Plan should have greater focus on these. High quality public realm areas should be identified, prioritised, and facilitate new experiences e.g. festivals. Requests reference to tourism and developing transport links to rural tourism destinations will improve visitor accessibility and support rural economy.
- e. Chapter 9: Synergistic benefits exist between tourism and heritage including elements of urban design. Suggested wording of new policy is: *'To support the adaptive re-use of heritage buildings for tourism and related services such as accommodation, museums which respect the historic character of the building and protects its integrity, subject to best architectural conservation practice and proper planning and sustainable development'.*
'Encourage the reuse and refurbishment of vernacular buildings (houses or farm/industrial buildings) in appropriate locations for tourist related facilities, including holiday home accommodation. The development shall relate in scale to the site characteristics and location, shall not be detrimental to the rural amenity of the surrounding area and be in accordance with development standards of this plan, particularly as they relate to the protection of the natural and built environment'.

- f. Chapter 11: Suggested this would benefit from identifying tourism in coastal areas has the potential to enhance the destination offering in Louth. An objective should be included to promote the development of the Irish Sea Way as highlighted in the Programme for Government.
- g. Chapter 13: Welcomes the standards but advises reference to relevant regulations and hence additional text to Section 13.13.3 to read: 'Any proposed caravan and/or camping site should be in compliance with the 'Registration and renewal of registration Regulations for Short term Tourism Accommodation Rental 2018'.

Chief Executive's Response:

Chapter 2 sets out the core and settlement strategy for County Louth and demonstrates its alignment with National and Regional policy, specifically the NPF and the RSES. Section 2.4.4 sets out Louth's Growth Strategy, which is based on strengthening its strong urban settlements, whilst simultaneously protecting and supporting rural areas, which provide valuable natural resources, biodiversity, environmental quality and landscape features. This section of the Draft Plan does not contain specific policy objectives and it is considered inappropriate to include a specific tourism policy objective within this section. It is noted that SO 7 within Chapter 1 is to "Protect and enhance the built, cultural and natural heritage assets of Louth, the intrinsic value of which helps to define the character of both urban and rural areas, contributes to the attractiveness, vibrancy and sense of place for residents, tourists and visitors, including improved access to the countryside through the development of greenways, walking trails and blueways in support of and advancing sustainable communities".

Section 5.19 outlines the key elements of the Rural Economy within County Louth. This includes a range of businesses and enterprises including agriculture, equine, construction, manufacturing and tourism. Diversification within the rural economy is further addressed within section 5.19.2 which specifically identifies rural tourism as a sustainable use of the countryside. Additional text within section 5.19.2 could be inserted in support of rural diversification and is outlined in the Chief Executive's Recommendation.

Section 6.1 provides a generally introduction to Tourism within the County and provides some relevant statistics. It is considered appropriate that the updated statistics be inserted into this section and is included in the Chief Executive's Recommendation.

The purpose of the Tourism chapter is to provide a policy context for the planning and development of tourism and tourism assets within the County. While a map would provide significant and insightful detail in relation to tourism within the County it is not considered necessary in the context of a County Development Plan and would be better accommodated within the Tourism & Heritage Action Plan.

In relation to Accessible Tourism, it is considered that such initiatives would be best promoted within the Tourism & Heritage Action Plan.

The request to carry out Accessibility Audits at key tourism hubs within the County is also considered an arduous task which would require significant resources.

At the design stage of developments, tourism related and otherwise, the Council will continue to promote universal design and accessibility for all. No specific policies are considered necessary.

Section 6.4.2 of the draft Plan addresses the Ancient Destination Development Plan 2020 – 2024 and supporting policy objectives are provided for. It is considered that TOU 24 could be amended to incorporate the suggested wording. See Chief Executive's Recommendation for wording.

Policy objective TOU 35 addresses the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes. This policy is considered to be sufficiently robust.

The Draft Plan acknowledges the important role played by public transport and the Local Link service in the provision of transport services within the County. As set out in the Plan, the National Transport Authority (NTA) has primary responsibility for the provision of public transport services within the County and the Council is committed to supporting the NTA and other stakeholders and community groups in improving bus services and infrastructure in the County. Cycling and walking are also acknowledged as being important modes of transport and their role as outright tourist destinations are set out within section 7.5.11 and 6.3.1. Additional text regarding transport links could be inserted in section 7.5.9 and is included in the Chief Executive's Recommendation.

The draft Plan acknowledges the role villages and towns play as tourist destinations in their outright and the important of High quality public realm plays. Additional text to be included in section 7.6 which is detailed in the Chief Executive's Recommendation.

The use of vernacular buildings for tourism accommodation is addressed within Chapter 6 – Tourism. The policy is to consider the development of self-catering accommodation in the countryside where existing buildings of character are to be converted or where the restoration of vernacular dwellings including thatched cottages is proposed. Similarly, consideration for the provision of glamping/camping accommodation outside of settlements is given where it is proposed to re-use existing vernacular buildings.

Whilst it is acknowledged that the 'Irish Sea Way' is presently still at concept stage, it is considered that additional text within Chapter 11 could be included to support this initiative at a local level and is included in the Chief Executive's Recommendation.

The inclusion of text relating Fáilte Ireland Regulations is considered appropriate within section to 13.13.3 - Caravan and Camping Sites and is in the Chief Executive's Recommendation.

Chief Executive's Recommendation

- Insert additional text (in red) into Section 5.19.2
The changing pattern of employment in agriculture has resulted in a new approach to the sustainable use of the countryside. Farm diversification has been identified as a method of broadening the employment base of rural areas and providing an alternative source of income to traditional farming methods. Examples include renewable energy development, energy crops, forestry and forestry recreation, rural tourism such as open farms/pet farms or equestrian activities, and the production of speciality products such as cheese or beef or artisan food and drink on a farm. This Draft Plan will support rural diversification projects subject to the use and scale of the development being compatible with the surrounding area.
- Insert additional text into Section 6.1 (additional text in red and deleted text in blue with a strikethrough)
“Tourism is one of the largest and most important sectors of the national economy, providing employment for approximately 260,000 people, an economic contribution of €7.8 billion (excluding carrier receipts), and exchequer revenue of €1.8 billion, which helps fund other key public services. With regard to County Louth, Fáilte Ireland’s figures indicate that 1% of overseas visitors overnight in Louth generating a similar share of revenue. According to CSO figures, the total number of trips to Ireland made by overseas visitors in 2019 saw an increase of 1.8% on 2018. ~~The Fáilte Ireland Topline Performance by Region 2017 estimates that there were 172,000 overseas tourists to County Louth in 2017, generating revenue of €55m.~~”
- Reword Policy Objective TOU 24 to include the following (additional text in red and deleted text in blue with a strikethrough);
“~~To support the implementation of the Ancient Destination Development Plan 2020 – 2024 within County Louth.~~ To support and work with Fáilte Ireland on the development and implementation of Destination Experience Development Plans and to engage with Fáilte Ireland to deliver the implementation of the Ancient Destination Development Plan 2020-2024 within County Louth.”
- Insert tourism specific text (in red) into section 7.5.9 – Rural Transport
“This Plan recognises the importance of rural transport in providing a social and economic connection between towns and villages, with the Local Link service having a pivotal role in revitalising rural towns and villages that will improve access to employment, public services and social networks that will support a high quality of life in rural areas. Public transport in rural areas also has an important role in supporting and developing tourism in towns and villages through the provision of services that can enable and facilitate visitor accessibility”.
- Insert tourism specific text into section 7.6 – Public Realm Improvements (additional text in red and deleted text in blue with a strikethrough)
“The Council is committed to improving public spaces in the towns and villages throughout the County in order to make the urban environment a more attractive place to live, work and do business.

A quality and attractive public realm can also make settlements more attractive locations and venues for hosting and facilitating festivals and events. ~~It is also acknowledged that the provision of quality public realm improvements support the Councils objective to promote and facilitate the development of new festivals and events and the provision of venues to host such events~~.

- Insert text (in red) relating to the 'Irish Sea Way' into section 11.5.6

"The coast is a natural amenity for leisure and recreation. The coastal areas of County Louth have significant potential for the tourist sector and help to generate sustainable local employment within coastal communities. **At a regional level, the tourism value of the coast is acknowledged in the emerging initiative of the 'Irish Sea Way'. It is considered that this initiative will further enhance the tourism value of Louth's coastline and the Council will work with the relevant stakeholders to support this initiative once it is launched**".

- Insert the following text (in red) into section 13.13.3 - Caravan and Camping Sites

"Any proposed caravan or camping sites shall have regard, in scale and layout design, to the existing character of the area in which they are proposed to be located. They shall generally be located within the development boundary of established settlements **meeting the highest quality and standards applicable**.

Consideration will be given to small scale facilities in appropriate locations outside of towns and villages subject to a demand and need for the facility being demonstrated to the satisfaction of the Planning Authority. This will require the preparation of a Business and Design Statement outlining, why the chosen location is the most appropriate location for the facility. It will also be a requirement to demonstrate compliance with all other planning and environmental criteria including suitability of the location, design, scale, integration into the landscape, access and service arrangements, residential amenity, in addition to outlining the potential impact on natural heritage and the local environment.

Submission No.	LCDP DR761
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Submitted by:	SSE
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Summary of Submission

1. Provides an overview of SSE in Ireland.
2. Onshore Wind & Recommendations:
 - a. Consistent implementation of Wind Guidelines is critical but that the council should not exceed its requirements and thus ensuring compliance with national guidance
 - b. LCC should engage with its neighbouring LA's & the region for a consistent approach to wind energy
 - c. SEAI Wind Atlas & other general data should not be used as a constraint when identifying suitable areas for onshore wind
 - d. Grid constraints should not be hard constraints when identifying areas
 - e. Planning permissions should allow for 30-35 years operation (min) so as not to limit operation and ensure developers have a strong business case at outset
 - f. Include policy for repowering.
3. Offshore Wind & Recommendations:
 - a. Plan should recognise potential opportunities for Louth regarding offshore wind and ensure policies onshore are consistent with the delivery of offshore wind by 2030.
4. Security of Supply & Recommendations:
 - a. LCC to encourage continued use/reuse/repowering of existing infrastructure to meet energy needs
 - b. Support opportunities for shared CCS (Carbon Capture & Storage) and hydrogen infrastructure to decarbonise conventional generation industry and transport
5. Energy Efficiency & Electrification of heat & Recommendations:
 - a. Plan should reflect Action 64 in the Climate Action Plan to increase energy efficiency in the LA housing stock
6. Electrification of Transport & Recommendations:
 - a. Spatial planning is critical to drive electrification of transport & the Plan should identify areas where EV charge points could be installed & competitively tender for these assets
7. Public lighting & smart technologies & Recommendations:
 - a. LA should strive for 100% conversion to LED
 - b. LA should develop an improvement plan for remedial actions to public lighting and introduce long term improvements to avoid unnecessary incidents on the system
 - c. There are opportunities for smart city technologies to be used in Louth to meet sustainability targets.

Chief Executive's Response:

1. The submission and overview of SSE is welcomed.
2. The most up to date Government guidance remains to be the 'Wind Energy Developments Guidelines for Planning Authorities, 2006'. In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines for public consultation. To date, given that the Department has not finalised its targeted review of the current guidelines, these guidelines remain in full effect and the Planning Authority must be consistent with the standards set out in same. The Planning Authority will ensure consistency with national guidelines and any subsequent Wind Energy Guidelines, once formally adopted and with the policy objectives of the Development Plan.

The council is committed to preparing a Renewable Energy Strategy as provided for in Policy Objective IU 47 which will include for Wind Energy and be informed by national guidance. In response to the issue of repowering the Council considers it appropriate to include a new supporting policy objective. The new policy objective is included in the Chief Executive's recommendation.

3. The Council considers that both the narrative and policy objectives relating to Off shore wind projects are robust in terms of supporting off shore wind farm developments and ensuring terrestrial developments supply adequate provision for connection to the national grid for such developments.
4. The Council in Section 10.10.1, 10.10.2 and 10.10.3 supports the reinforcement and development of enhanced electricity and gas supplies and associated networks to serve the existing and future needs of the County and Region. Further, Louth County Council recognises new technologies and hybrid generation as outlined under Action 18 and 23 of the Climate Action Plan. Louth County Council will be guided by national policy in this regard.
5. Comments relating to energy efficiency and electrification of heat are noted and welcomed. The Draft Plan in Policy Objective IU 73 supports initiatives to limit greenhouse gases by incorporating energy efficiency measures into the design of new buildings and the retrofitting of existing buildings. Further, Policy Objective IU 74 seeks to ensure that new buildings in the County achieve the Nearly Zero-Energy Buildings standard (NZEB) in line with the Energy Performance of Buildings Directive (EPBD) and having regard to the Guidelines for Sustainable Design and Energy Efficiency in Buildings. Action 64 of the Climate Action Plan 2019 refers to the introduction of minimum BER standards in the Local Authority social housing stock. While this falls outside the remit of the County Development Plan, Chapter 13 demonstrates how the Plan aligns with the specific climate action targets set out in the Climate Action Plan 2019.

6. The benefits that integrated land use and transportation planning can offer are acknowledged and the need for compact growth in tandem with sustainable modes of transport is supported throughout the entire Draft Plan. The Draft Plan supports the roll out of additional electric charging points at appropriate locations in association with the relevant agencies and stakeholders. To identify EV charge points at this stage would be premature pending consultation and the proposal to competitively tender is outside the remit of the Development Plan.
7. Regarding LED lighting the Council supports and promotes the use of low energy LED (or equivalent) lighting in support of climate Change (ENV 10). All public lighting in new residential developments are also required to be high performance low energy LED lanterns or any upgraded lantern as agreed with the Planning Authority. Further, it is noted that Louth is one of the Councils which is taking part in the National LED Retrofitting Programme across the country, which will see every street light (approximately 13,200) converted to LED, during the lifetime of the Plan.

In relation to the observations regarding Smart City Technologies, the Council has included in the Draft Plan Policy Objective EE 31 which supports the development of Smart City programmes in the two Regional Growth Centres of Drogheda and Dundalk. In relation to the integration of lighting and EV charging, this is not the preferred option of the Council, but rather easy charging on individual pedestals. (LCC has secured an SEAI grant for the provision of same in residential areas).

Chief Executive's Recommendation:

1. No Change
2. Insert new Policy Objective

Policy Objective

IU XX	To support the repowering/life extension of wind turbines where appropriate and subject to normal proper planning considerations'.
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3. No Change
4. No Change
5. No Change
6. No Change
7. No Change

Submission No.	LCDP DR463
Submitted by:	Eirgrid

Summary of Submission

1. Highlights involvement in making of Ireland 2040 and EMRA RSES.
2. Outlines function for safe, secure and reliable transmission of electricity.
3. Welcomes commitment in the Plan to preparation of a Sustainable Energy Action Plan for the county and generally supports policy objectives in the Plan.
4. Observations relating to Policy Objectives IU 69 & IU 70 are highlighted:
 - a. Any application by Eirgrid or other is subject to the planning process including potential impacts on environment, culture, visual etc.
 - b. Removal or under-grounding of power lines in urban areas is overly restrictive & not always possible and therefore it is requested that these two policies are omitted.
 - c. In planning options for new transmission grid infrastructure, Eirgrid balances a variety of considerations (environment, technical & landowner). Where overhead lines cannot be avoided, the reasons are documented.
 - d. Suggests inserting RPO 10.22 into the Draft Plan.
5. Development of the transmission grid is critical to support the economy and society & help meet climate change and energy obligations requiring appropriate and robust policy objectives for planning this infrastructure.

Chief Executive's Response

- The Council notes the involvement of Eirgrid in the making of both national and regional policy documents and its function and role in transmitting electricity. The Council also welcomes Eirgrid's support for the preparation of a Sustainable Energy Action Plan and its general support for the policy objectives of the Draft Plan.
- In relation to Policy Objectives IU 69 and IU 70, the Council notes the observations raised in the submission and the request for omission of the aforementioned policy objectives which are deemed overly restrictive.

In relation to IU69, the Council is of the opinion that this policy objective which seeks to ensure that development follows best practice is not overly restrictive. The inclusion of the wording 'consideration' within the Policy Objective recognises that there may be circumstances where undergrounding, for a range of reasons (e.g. technical, economic), may not be possible. Therefore, it is considered appropriate that IU 69 is not omitted.

In response to the concerns raised regarding IU 70, it is considered that this Policy Objective should be retained, but split into two separate policies and an amendment to the wording to allay issues raised in the submission.

In this regard it is recommended that IU 70 be subdivided into two policies and are detailed in the Chief Executive's Recommendation.

- With regard to the RSES and Section 10.3 the Council proposes to include a new Policy Objective avoiding sterilisation of lands proximate to public transport corridors. It is recommended that the following new Policy Objective be included. Wording for Policy Objective is in the Chief Executive's Recommendation.
- In relation to the inclusion of RPO 10.22 of the RSES it is the opinion of the Council that the inclusion of Policy Objective IU 67 is sufficiently adequate in the support of the electricity supply and networks.
- The Council recognises the critical importance of the transmission grid in supporting the economy and society and in helping to meet energy obligations which it is considered is adequately acknowledged in both the narrative and policy objectives of the Draft Plan.

Chief Executive's Recommendation

- Insert additional text (in red) into Policy IU 70;
~~To require the undergrounding of electrical cables within new residential, commercial or civic developments.~~ Where existing and proposed high voltage lines traverse new residential, commercial or civic developments, these should be relocated underground, where technically feasible, **economically viable and environmentally appropriate.**

Insert new Policy Objectives:

- **To require that in all new developments, local services such as electricity be undergrounded where possible and appropriate.**
- **To seek to avoid the sterilization of lands proximate to key public transport corridors such as rail routes when future energy transmission routes/pipelines are being designed and provided.**

Summary of Submission

1. Onshore wind must grow to meet renewable energy targets as required by Ireland's Climate Action Plan and Louth must develop an Energy Strategy to increase opportunities for onshore wind projects to help reach 2030 targets.
2. National Climate Action Plan (CAP) 2019 has a 70% target for renewable energy by 2030, which is a doubling on existing figures in half the time (i.e. 10 years). Onshore wind will provide the majority of the electricity yield and all LA's should be cautious when designating areas so as not to constrain any areas that may have potential.
3. 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' requires that Plans with policies on wind energy follow 3 actions:
 - a. Documentation of overall national policy on renewable energy
 - b. How implementation of Plan will help realise overall national targets on renewable energy & climate change mitigation especially wind energy resources
 - c. Demonstrate compliance with (b) above concerning DM objectives and ensure the DM objectives are subject to SEA & AA with regard likely effects on climatic as well as environmental factors.
4. Clear & supportive planning policies for wind development are necessary to meet challenges of climate change and decarbonising the Irish economy.
5. Welcomes commitment to principle of wind energy development and inclusion of Map 10.1 but disappointed a Wind Energy Strategy has not been delivered and encourages same.
6. Renewable Energy Strategies and Landscape Character Assessments provide guidance on siting wind farms traditionally on landscapes of lower sensitivity. To meet national targets going forward developments will need to move to slightly more sensitive landscapes.
7. Nationally there is no guidance on how many MW or GW of wind energy each LA has to meet. To meet national targets (4.2GW) requires a sufficient quantum of land to accommodate many multiples of 4.2GW to allow for the natural attrition rate of the wind energy development process, whereby, not all theoretical potential will convert into actual potential. LCC needs to classify a sufficient quantum of land as being suitable for wind energy based on what will likely translate into installed MW or GW capacities having regard to attrition hurdles. Key to this is the Landscape Character Assessment (LCA).
8. LCA dated 2002 and not updated. Here in the areas deemed potentially suitable for wind energy are less than those identified as 'Suitable for development' on Map 10.1. Seven of the nine landscape character areas were not deemed suitable for wind energy due to inadequate access to the grid and insufficient wind speeds. National guidance and technology has advanced and in the absence of a National LCA, LCC is urged to update its LCA to accompany the Wind Energy Strategy. Data used (implies LCC here) is outdated and nationwide wind speed should not be considered as a constraint for site suitability at the strategy preparation stage. Additionally the SEAI Wind Atlas is not as accurate as on site wind measurements.

Therefore wind speed should not be considered as constraint to wind energy development. Transmission network should not be considered as a constraint to wind energy development.

9. IWEA will advocate the preparation of Regional Renewable Energy Strategies be prioritised by the 3 Regional Assemblies.
10. Concludes: LCC review Plan in relation to its designations for wind energy development in its LCA and produce a Renewable Energy Strategy aligned with best practice approaches where wind speed & proximity to grid nodes are not constraints to development.

Chief Executive's Response:

1. The importance of Wind Energy both onshore and off-shore is fully acknowledged by LCC in the Draft Plan. The Draft Plan recognises that in line with national policy, a radical shift away from our current reliance on fossil fuels will require significant changes nationally to the grid, existing infrastructure, legislation and the regulatory framework if we are to move to a more sustainable energy system. To this end the Draft Plan continues to support and encourage the principle of wind energy development in both narrative and policy objectives (IU 51-IU53 and IU 55 and IU 56). The Council is also committed to preparing a Renewable Energy Strategy (IU 47) during the lifetime of the Development Plan.
2. The renewable energy targets as identified in the National Climate Action Plan (CAP) are acknowledged in the Draft Plan specifically in both Chapters 10 and 12 and supporting policy objectives. (See Response to OPR Submission LCDP 817).
3. The Draft Plan acknowledges the importance of renewable energy and how implementation of its policy objectives will help realise overall national targets. It notes that international, European and national policies all seek to support a more energy efficient society by relying on sustainable energy sources. The Draft Plan policy objectives specifically support initiatives for *inter alia* limiting and reducing emissions of greenhouse gases through energy efficiency, reduction in countywide energy consumption and development of renewable energy sources at suitable locations, utilising the natural resources of the County. Specifically in relation to Wind Energy, the narrative of the Draft Plan acknowledges the significant contribution that wind energy makes to a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions. The importance of onshore wind as Ireland's main source of renewable energy in the next decade and the consequent and significant changes thereby required are noted. The corresponding policy objectives to this narrative, including off shore wind generation, encourages the development of wind energy in the County in accordance with available Government guidance (and guidance that may be issued during the course of the Plan). All policy objectives of the Plan and development management standards have been subject to SEA and AA with regard to likely effects on climatic as well as environmental factors. (See Response to OPR Submission LCDP DR0817).

4. The Council considers that the planning policy objectives in relation to wind energy are both clear and supportive in recognition of the need to meet challenges of climate change and de-carbonising the Irish economy. (See Response to OPR Submission LCDP DR0817).
5. Support expressed in the submission for wind development policy objectives is welcomed. The Council is committed to preparing a Renewable Energy Strategy for the County during the lifetime of this development plan. Further consistency with the RSES to support the identification, in conjunction with EMRA of Strategic Energy Zones is supported in Policy Objective IU 48 of the Draft Plan.
6. Comments relating to wind energy developments needing to move to slightly more sensitive landscapes are noted and can be considered during the preparation of the Renewable Energy Strategy.
7. See Response to OPR Submission LCDP DR0817, Item 5 above and Item 10 below.
8. The Council notes the comments in relation to the LCA. It is a policy objective of the Plan if necessary, to review and update the Louth LCA (on foot of a framework for regional and local landscape character assessments as outlined in the National Landscape Strategy 2015-2025) and to prepare a Renewable Energy Strategy for the County during the lifetime of the Plan. In the meantime wind energy development must have regard to the provisions of the LCA and existing Wind Energy Guidelines.
9. Advocating preparation of Regional Renewable Energy Strategies by the 3 Regional Assemblies is noted.
10. Issues relating to review of the LCA and preparation of a Renewable Energy Strategy are noted and addressed in responses above.

Chief Executive's Recommendation:

See Recommendations of OPR (817), EMRA (099) and ESB (614)

Submission No.	LCDP DR287
Submitted by:	Sustainable Energy Authority of Ireland(SEAI)

Summary of Submission

1. The submission acknowledges Louth County Councils support for SEAI's SEC Programme and Mentors. The Council's Energy Team is strengthening its work with Community Groups seeking to become Sustainable Energy Communities and that will undoubtedly increase the number of Sustainable Energy Communities in the County. This should be stated more clearly in the Plan.
2. Acknowledges that Louth County Council is aligning with the Climate Action Plan 2019 by driving action through national Dialogue on Climate Change by supporting programmes of education on energy and renewable energy plus other factors that impact on climate change in communities across the county. This should be emphasized within the Plan.
3. The CDP also needs to more clearly emphasise the Council's support for the implementation of National and County initiatives for limiting emissions of greenhouse gases by stating its support for accelerating the retrofitting of existing buildings throughout the county
4. The CDP may make reference to the promotion and support of the role for communities in the expanding National RESS programme.

Chief Executive's Response

The Council welcomes the acknowledgement that Louth County Council has supported the SEAI's SEC Programme and Mentors and also the acknowledgement that the Council is aligning with the Climate Action Plan 2019. The focus of the Draft Plan and in particular Chapter 12-Climate Action is to demonstrate that the policy objectives within the Draft Plan are compatible and are aimed at achieving the targets set down in the Climate Action Plan 2019. Support for various climate action community projects is set out within the Louth County Climate Change Adaptation Strategy 2019-2024 and further text is not required in the County Development Plan.

The Draft Plan set outs the policy framework for the future development of the County. As outlined in Section 13.16.2 the retrofitting of existing buildings and the integration of solar infrastructure into the design of new buildings will be generally encouraged. Policy support is also provided for the retrofitting of buildings within IU 73 and IU 76.

Chief Executive's Recommendation

No Change

Submission No.	LCDP DR614
Submitted by:	ESB

Summary of Submission

1. Broadly supports the Plans vision with observations on strategic issues for inclusion in the Plan. It seeks to ensure long term operational requirements of existing utilities are protected recognising infrastructure and operations are strategic and national in nature and presents an overview of the role of the ESB alongside its Strategy.
2. Notes policies in the NPF & RSES regarding Energy Infrastructure, importance of sustainable development to influence reduction in GHG emissions, the role of the ESB in meeting targets including reduction in GHG emissions & electricity generated from renewable sources.
3. Supports reinforcement of NPF & RSES policies at local level. Restrictive policy (IU 70 which outline preferred option in advance) may prevent development of optimum design for infrastructure where all environmental, technical & economic factors as required are considered and the inclusion of which is not consistent with Government policy and objectives
4. Committed to delivery of a low carbon energy sector and welcomes supporting objectives in the Plan. 2019 Draft Wind Energy Guidelines should inform planning authority policy. Suggests wording of IU 45 be extended to include reference to neighbouring counties to ensure consistency & facilitate development of wind farms across county boundaries through implementation of RSES objectives (RPO 10.19-RPO 10.24).
5. Permissions for Solar PV should have lifetime of 40 years max, reflecting operational life & financial modelling with issues of deterioration of infrastructure addressed through the lodgement of a bond and the provision of a Decommissioning Plan.
6. Would welcome additional policies regarding energy storage such as Green Hydrogen & suggests favourable consideration be given for hybrid renewable plant in suitable locations in the county. Notes that Demand-side management opportunities could encourage development in the County.
7. Facilitate expansion and improvement of telecommunications infrastructure, helping attract intellectual and physical capital to the county & improve virtual connectivity.
8. Promote and facilitate sustainable modes & patterns of transport including EVs with minimum levels of parking provision for EVs.

Chief Executive's Response:

1. The submission from ESB to the Draft Plan is welcomed including support for the vision of the Draft Plan. The council notes the ESB's overview in terms of strategy, its generation, transmission and distribution systems, and its roll out of EV infrastructure, telecoms and telecommunications.
2. The Council notes the reference to the hierarchy of planning policy in Ireland and the framework wherein the Draft Plan sits. Support expressed in the submission for SO 4 and other policy objectives supporting the delivery of infrastructure to meet future energy needs and influencing a reduction in GHG emissions through sustainable growth is welcomed.

3. Recognition in the submission for support of national and regional promoting policies regarding energy infrastructure in the policy objectives of the Draft Plan is welcomed by the Council. Observations in relation to Policy IU 70 are noted, whereby it is deemed to restrict consideration of all options before details and specific circumstances of an individual project have been considered, therefore prejudicing the optimum solution. In response to the concerns raised regarding Policy IU 70, see response to Eirgrid submission DR00463 where it was recommended to amend this policy objective.
4. Support for Section 10.5.1 of the Draft Plan and Policy Objective IU 47 concerning the production of a Renewable Energy Strategy is noted and welcomed. Observations regarding the Draft Wind Energy Guidelines 2019 and the need for both policy objectives and development management standards to be updated are noted. Policy IU 51 clearly states that wind energy development will be encouraged in accordance with guidelines and revisions thereof, to reflect the most up to date guidance available. It is considered appropriate to simplify Policy Objective IU 51 and rewording of Policy Objective is contained in the Chief Executive's Recommendation.
In relation to Policy Objective IU 45 it is considered that the co-operation referenced relates to authorities in the south. It is therefore not considered necessary to amend this policy. Recognition of supporting policy objectives regarding offshore wind development and supporting land based infrastructure within the Draft Plan is noted and welcomed.
5. Recognition for supporting policy objectives regarding solar projects within the Draft Plan in addition to the Development Management Standards is noted and welcomed. Regarding the observations relating to the grant of permission for the standard 5 years, it should be noted that this time period for completion of the development can and has been extended for longer periods e.g. 10 years. With regards to the life-span of the project and the reference to 40 years (which is interpreted as referring to the de-commissioning period), this is a development management consideration which is assessed on a case by case basis and is best dealt with by way of condition rather than a policy objective in the county development plan.
6. Louth County Council recognises new technologies and hybrid generation as outlined under Actions 18 and 23 of the Climate Action Plan 2019. Louth County Council will be guided by and implement national policy in this regard. Observations relating to Demand Management are noted.
7. Support for Section 10.4.2.4 of the Draft Plan, Policy Objectives IU 36-42 and development management standards concerning telecommunications is noted and welcomed.
8. The policy objectives for provision of EVs are set out in MOV 6 and MOV 7 and Section 13.14.9 Charging Points for Electric Vehicles requiring the provision of 20% of these charging points which is considered appropriate.

Chief Executive's Recommendation

1. No Change
2. No Change
3. No Change

Replace existing Policy Objective IU 51 wording with the following (New text in **red** and deleted text in **blue** with a **strikethrough**);

Policy Objective	
IU 51	'To encourage the development of wind energy, in accordance with Government policy and have regard to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to Wind Energy Development and the DDCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued in relation to sustainable energy provisions during the course of the Plan' 'To encourage the development of wind energy, in accordance with Government policy and guidance and the Wind Energy Development Guidelines (2006) or any revisions thereof which may be issued during the lifetime of the Plan.'

4. No Change
5. No Change
6. No Change
7. No Change

Submission No.	LCDP DR362
Submitted by:	Gas Networks Ireland (GNI)

Summary of Submission

1. GNI involved in 2 initiatives in Louth:
 - a. Development of Renewable gas injection infrastructure
 - b. Development of Compressed Natural Gas infrastructure for gas in transport
 - c. Has proposed changes and additional text in relation to 4 chapters as below.
2. Chapter 7 Movement: This relates to carbon emissions with particular emphasis on HGVs and potential of CNG into the future.
 - a. An additional section relating to CNG in transport is proposed for inclusion. (Wording for suggested additional text is provided).
3. Chapter 10 Utilities: Welcomes initiatives in Plan supporting alternatives.
 - a. It suggests additional wording 'when upgraded to biomethane' in Section 10.8
 - b. Additional narrative relating to renewable gas.
 - c. Supports Policy Objective IU 67 stating availability of gas is major industry locator (Wuxi quoted).
4. Chapter 11 Natural heritage, Biodiversity & Green Infrastructure: GNI uses a partnership approach with environmental & heritage groups on construction projects with specialists carrying out assessments at planning & construction stages. ENV 12 identifies air quality as a target area for improvement and it is proposed that natural gas can be used to improve air quality by fuel switching across multiple energy sectors.

5. Chapter 12 Climate Action: Welcomes the support for Anaerobic Digestion in the draft Plan particularly with reference to farming and associated emissions from agriculture and to minimizing wastes and contributing to the circular economy with the production of renewable energy.

Chief Executive's Response:

1. The Council welcomes the comments from GNI and its clarity in format in addressing specific chapters of the Draft Plan.
2. The Draft Plan strongly supports the transition to a low carbon society. It is recognised that reducing emissions from the transport sector will be a significant challenge. There would be no objections to the inclusion of a section in Chapter 7 highlighting the benefits of Compressed Natural Gas and the role it can play in reducing emissions. The additional text is contained in the Chief Executive Recommendation.
3. GNI support for both narrative and policy objectives relating to Bioenergy and recognition of its advantages including security and diversity of supply, alternative farming opportunities and potential to reduce greenhouse emissions is welcomed by the Council.
 - a. In the interest of clarity, rather than the wording suggested, the Council proposed the insertion of the additional text in Section 10.8. as outlined in the Chief Executive Recommendation:
 - b. The Council recognises the advantages of bioenergy and supports the development of bioenergy projects as required by Action 71 and Action 130 in the Climate Action Plan 2019. In this regard, the Council agrees to the inclusion of additional text supporting investment in the sustainable development of an agricultural biogas sector and its integration into the grid network
 - c. The Council welcomes support for initiatives of Section 10.8 in conjunction with the corresponding policy objectives, in particular IU 67.
4. The Council notes the partnership approach of GNI with environmental and heritage groups on construction projects and the reference to natural gas helping realise air quality improvement (ENV 12).
5. Support for anaerobic digestion with particular reference to farming and associated emissions from agriculture, to minimizing wastes and contributing to the circular economy is noted.

Chief Executive's Recommendation:

1. No Change
2. Insert the following additional text into section 7.5;
7.5.* Compressed Natural Gas (CNG)
CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles.
The development of CNG Infrastructure will enable fuel switching from diesel to CNG for heavy goods vehicles (HGVs) and buses. CNG is an established technology that is used in many countries around the world.

CNG produces less carbon emissions than diesel and leads to improved air quality with 95% less particulate matter, 70% less Nitrogen Oxide, and 80% less Sulphur Dioxide (<https://www.ngva.eu/policy-priorities/air-quality/>).

CNG vehicles can be run on 100% renewable gas. This is a clean, renewable and carbon neutral fuel, produced using Anaerobic Digestion (AD) technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste.

Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study⁵ that is supported by the European Commission through the CEF Transport Fund⁶ and the Commission for Regulation of Utilities (CRU).

The Draft Plan will support the use of gas in transport and will facilitate the provision of any refuelling infrastructure in appropriate locations in the County, subject to the requirements set out in section 13.12.5 'Service Stations and Retailing' and any other relevant planning and environmental considerations.

3. Include additional wording (in red) in Section 10.8;

'Biogas, (when subjected to suitable processing) can be injected into the natural gas grid to complement or substitute natural gas....'

The Council will promote renewable gas and support investment in the sustainable development of an agricultural biogas sector and assist in the integration of renewable gas into the grid network.

4. No Change

5. No Change

Submission No.	LCDP DR805
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Submitted by:	Coillte
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Summary of Submission

1. Provides an overview of the Coillte Group including information in relation to forestry extent, employment, public benefits including community and environment. Outlines importance and co-operation from a tourism, recreation and commercial perspective.
2. Committed to managing its forest estate in Louth in a sustainable manner & work in partnership with stakeholders and LCC, protecting and enhancing while supporting further recreation infrastructure at appropriate locations in the County.

3. Welcomes supporting policies in the Plan and requests the Council:
 - a. Supports rural based enterprises such as forestry and tourism with objectives to facilitate delivery;
 - b. Continue to have regard to regulatory framework of the Forestry Act 2014;
 - c. Ensure zoning of sufficient lands for recreation, commercial & community use;
 - d. Support provision of accessible recreational/community/sporting facilities;
 - e. Support tourism infrastructure at appropriate locations in Coillte estate;
 - f. Promote use of sustainable timber products in Plan policy.

Chief Executive's Response

The Draft Plan clearly sets out policy objectives which support sustainable rural based enterprises such as forestry and tourism in the county. This includes policy objective ENV 30 through to ENV 35.

It is considered that the Draft Plan also provides for appropriate levels of zoned lands for recreational, commercial, tourism and community uses. These uses are accommodated within a number of the different zoning objectives identified in the Plan. The Plan also takes account of accessible recreational, community and sporting facilities through the appropriate zoning objectives for facilities such as playing pitches and green infrastructure networks.

The Draft Plan specifically makes reference to Coillte estates at Ravensdale Forest and Slieve Foye Woods in the north of the county and Townley Hall and provides for policy support for appropriate and sustainable tourism development within forestry locations (ENV 35, ENV33).

The Draft Plan sets out policy in support of a well-managed sustainable forestry sector. As highlighted in Section 10.11.11, consideration should be given to the use of renewable building materials such as wood from sustainably managed forests and locally sourced building materials for development projects.

Chief Executive's Recommendation

No Change

Summary of Submission

1. Acknowledges the physical extent of the Plan and targeted population growth of Dundalk and Drogheda to 50,000 population, but with only 1 reference to the Garda therein.
2. Potential tourism growth in Drogheda due to the Boyne Greenway and population growth to the north generates security concerns and highlights need for extra policing resources.
3. Recommends Plan provides for consultation with the Garda prior to developing the lands to the north and Risk Assessment when developing the Boyne Greenway.
4. Plan fails to recognize the Operating Model of Policing in the organisation where Louth will become the Divisional Headquarters for Louth, Cavan and Monaghan. Prior consultation with the Garda would ensure preparedness for implementation of this plan and would benefit future development.
5. Plan would benefit from acknowledging additional stresses on emergency services including the Garda, that future development in the County will cause and provide a strategy to meet the challenges.

Chief Executive's Response:

1. The Council acknowledges the singular reference in the Draft Plan to An Garda Síochána which falls under the heading of Emergency Services.
2. The Council acknowledges that with a targeted population growth to 50,000 persons in not only Drogheda (as referenced) but also Dundalk will, similar to population growth throughout the Country, generate security concerns from a policing perspective.
3. The request that the Plan provide for consultation specifically in relation to the development of the North Drogheda Environs and the Boyne Greenway is noted.
4. While the Council recognises that there are other Operating Models that are in place with various organisations, it is not the role of the CDP to refer to each model as it would be impractical. The Council promotes and encourages collaboration with stakeholders and organisations and will continue to do so and as such there is no requirement for the CDP to make specific reference to Operating Model of Policing.
5. The implications of future development within the County as a whole and specifically in the Regional Growth Centres of Drogheda and Dundalk, is wide ranging across a plethora of disciplines. The Council will continue to strive in conjunction with the relevant agencies to provide an efficient and effective service for the population of the County.

Chief Executive's Recommendation

1. No Change
2. No Change
3. No Change
4. No Change
5. No Change

Summary of Submission:

1. Provides the background to An Post which operates 2 distinctive businesses: An Post Mails and Parcels and An Post Retail (Financial services), its properties, substantial road fleet, with increasing electric vehicles etc. Ecommerce has seen a change in the system with substantial increases in online shopping, growing population, new settlements and improved infrastructural linkage. An Post will require additional sites to meet increasing demands. In relation to Louth, it notes the projected population growth for the County and the two Regional Growth Centres.
2. Request Council to include policies to support An post in enhancing facilities and services. In this regard suggests three policies:
 - *To support An Post in the provision of new postal facilities and the enhancement of existing facilities including operational requirements in the County.*
 - *To facilitate the provision of postal infrastructure at suitable locations in the County.*
 - *To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement.*
3. Council to recognise their specific operational requirements especially in relation to car parking, access and deliveries.
 - a. That the Council adopt a flexible approach with parking standards which require sufficient (namely additional) parking spaces for both delivery vehicles and employees (including EV charging). Anticipated into the future as postal trends evolve that greater car parking will be required.
 - b. Access required on 24 hr basis. Restrictions on times of deliveries/collections etc. impacts on ability of An Post to meet postal needs. Requests Council to recognise this requirement and consult with An Post prior to attaching any such requirement in a town centre location etc.
 - c. Sufficient loading bay space is required for collection/delivery and customers. In future public realm & movement strategies that the Council consult with An Post to ensure sustainable solutions to maintain sufficient access for An Post.

Dundalk & Drogheda: Would like to engage with the Council in relation to the preparation of the Joint UAP Drogheda and the UAP for Dundalk and recognition of An Post within the land use zoning matrix.

Chief Executive's Response:

This Submission is noted and welcomed and the Council anticipates continuing to work collaboratively with An Post into the future.

The proposed policies are acknowledged and have been reviewed against the policy objectives included in the draft Plan. It is considered that the policy objectives and zoning objectives in the Plan are sufficient to cater for any new postal facilities or consolidation of existing operations. It is not considered necessary to include any specific policies for An Post in this regard.

Chapter 13 (Development Management Guidelines) sets out the standards and guidelines which will be applied in the assessment of development proposals. Specific An Post developments will be assessed against the criteria set out in Chapter 13, including the detailed car parking standards set out in Table 13.11.

Chief Executive's Recommendation:

Recommendation – No Change

Submission No.

LCDP DR579

Submitted by:

Northern Ireland Environment Agency (NIEA)

Summary of Submission:

1. Welcomes transboundary considerations, the 15km buffer to identify potential impacts beyond development plan area and consideration of the NI wider environment. Specific comments are outlined.
2. DAERA Inland Fisheries have concerns regarding:
 - i. Plans that may impact on transboundary watercourses & which may be impacted by proposed development in relation to migration of fish or barriers to same.
 - ii. Passage of migratory fish in marine environment & development (e.g. offshore wind farm) that might impact their life cycle. Would welcome opportunity to comment on applications with transboundary impacts & will do when requested.
 - iii. Drinking Water Inspectorate notes a development must not impact on the quality or sufficiency of a private water supply.
 - iv. Transboundary Issues includes engagement with IW and consideration of private water supplies in Louth. Requests similar consideration for the Transboundary regions and its drinking water sources
 - v. Early engagement with NI Water to establish if there are public water supplies which may be impacted by a project and details of proposed mitigation if applicable.
3. SEA and Natura Impact Report – AA Comments
 - a. Historic Environment Division (HED) welcomes considerations of transboundary impacts on cultural heritage & suggests it has an important relationship with the natural environment & biodiversity e.g. archaeology
 - b. Welcomes consideration of UK marine legislation & policy. Table 8.2 could have further developed the transboundary marine effects.
 - c. Advises of requirement to prevent deterioration of the status of a water body under the Water Framework Directive & provides links to current publications.

Chief Executive's Response:

1. It is noted that the transboundary considerations within the Draft Plan (including the Environmental Reports) are welcomed.
2. The DAERA Inland Fisheries comments are noted. The majority of County Louth is within the Neagh Bann River Basin District, with south Louth being covered by the Ireland River Basin District (previously the Eastern River Basin District). It is the policy of the Plan to implement the recommendations contained in the River Basin District Management Plans for Ireland 2018-2021. The Plan focuses on ensuring water quality is of the highest possible standard. This includes surface water, ground water, estuarine and coastal. The protection of water quality and the marine environment within the County will contribute to overall water quality protection within the region.
3. The comments in relation to the considerations of transboundary impacts and UK marine legislation & policy within the Environmental Reports are noted and welcomed.

Chief Executive's Recommendation

No Change