



Planning Ref: NR 2040 strategy
(Please quote in all related correspondence)

12 April 2023

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Appropriate Assessment of National Roads 2040 Strategy

A chara

I refer to correspondence dated 16th February 2023 with accompanying Natura Impact Statement (NIS) in respect of the National Roads 2040 strategy, hereafter referred to as NR2040. The Department acknowledges receipt of this NIS as a referral to the Minister in accordance with the provisions of Regulation 42(9) of the European Communities (Birds and Natural Habitats) Regulations, 2011 to 2021.

Outlined below are further heritage-related observations/recommendations coordinated by the Development Applications Unit under the stated heading.

Nature Conservation

The Department notes that the NR2040 is a policy led strategy and has been developed to align with the National Investment Framework for Transport in Ireland and other government policies in relation to climate change and sustainable transport. The Department welcomes this shift to a more sustainable transport system that will promote 'decarbonisation' by encouraging active travel.

The strategy does not propose specific locations for future developments but it does highlight the requirement for appropriate environmental assessments at project stage. The NIS has identified that plans and projects arising from this strategy have the potential to adversely affect European sites. In particular, it is noted that cycle routes and greenways located in or near European sites have the potential to adversely affect European sites (*Evaluation of Adverse Effects in the absence of Mitigation from NR2040*, Page 38). The Strategy for the Future Development of National and Regional Greenways requires that greenways must be in scenic locations and this objective poses an additional threat to European sites. European sites tend to be at scenic locations due to the presence of natural ecological habitats (coastal,

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peatland and rivers). It is imperative that adequate mitigation measures are proposed at a strategic level to avoid impacts to European sites rather than an over reliance on environmental assessment processes at project level.

The Department recommends, that prior to carrying out the AA determination, that the mitigation measures in NIS clearly identify the need to ensure:

- All plans and projects arising from the NR2040 will as a general principal avoid European sites as a first preference.
- Any proposed routes arising from the NR2040 will ensure that the route corridor has adequate flexibility at the route selection process to ensure impacts to European sites can be avoided.

The above recommended updates are in the interest of clarity and to ensure any plans or projects arising from this NR2040 avoids any likely significant effects to a European site. The Department would also like to reiterate the importance of ensuring all mitigation measures, as outlined in the NIS, including the above recommended updates are included in the final strategy.

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

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Is mise le meas,

Michael Murphy,
Administration
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