

Uimhir Thagarta Uathúil: CLW-C10-106

Údar: Pádraig Webb

Stádas: Submitted

Submission: Swifts, Biodiversity, Peatlands, Green Infrastructure

Comhairliúchán:

Draft Carlow County Development Plan 2022-2028

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## Litir Chumhdaigh

Dear Sir/Madam,

In the midst of a Biodiversity and Climate emergency the suggestions made below will show how natural heritage and biodiversity can be conserved and enhanced going forward along with sustainable development in both urban and rural areas .

### Observations:

#### Chapter 3: Housing

Caibidil: Volume 1: Written Statement» Chapter 3:

Housing

#### Population and Housing

- ***Include planning provisions for the requirement of environmentally sustainable nest boxes for bats and swifts to encourage urban biodiversity in largescale new developments within the county such as any extensions to the IT Carlow Campus and Technological University, Carlow College St. Patrick's, any other third level institutions, secondary schools, primary schools, housing estates urban regeneration areas etc with a particular focus on urban areas throughout the county.***
- ***Tinryland Proposed changes in zoning see figure attached; Change from Village Expansion area to Open Space and Amenity as this is a much used walking route by members of the community and the Tinryland Athletics Club also forming an integral part of the route for the Carlow Cross Country Championships and Odlum Cup. Welcome the designation of the parish community fields as Open Space and Amenity currently much used by the community for recreation and look forward to investment in enhancing the facilities available to the St. Josephs AFC soccer club, Tinryland Athletics Club, and Bennekerry Tinryland community games who all use this facility.***

#### Attachments:

 CLW-C10-106-1514 - tinryland proposed zonal change of use. .pdf

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#### Chapter 6: Infrastructure and Environmental Management

Caibidil: Volume 1: Written Statement» Chapter 6: Infrastructure and Environmental Man...

## Green Infrastructure/ Regeneration Strategy

The Carlow County Development Plan review will “deal with biodiversity and environmental protection”....., it refers to the United Nations sustainable development goals including goal 15 which aims to “ Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”, it acknowledges the role of heritage in promoting biodiversity.

Project Carlow 2040 acknowledges the benefits of biodiversity, particularly in an urban setting. It includes enhancing biodiversity resources under its sustainability principles for development going forward.

*“Urban policy-makers have increasingly been exploring the links between urban planning and public health, specifically in relation to the potential for urban environments to have positive impacts on health outcomes and healthy lifestyles, such as through.....access to ‘nature’/biodiversity”.*

*“These health services are understood to range from direct positive effects on mental and physical health from increased biodiversity, to improved well-being resulting from increased exposure to nature”*

*“Supports biodiversity initiatives in the Town Centre.”*

*“Encouraging biodiversity within the public realm.”*

*“Integrating unique amenity and biodiversity spaces into the urban fabric”.*

*“Protect and enhance Carlow Town’s unique biodiversity”*

*“Maintaining, enhancing and protecting healthy air and water and enhancing biodiversity resources”*

- ***These benefits of biodiversity also need to be acknowledged in the Carlow County Development Plan 2022-2028 such that developments/initiatives contributing to such biodiversity and human health and well-being are adequately funded, resourced and acknowledged and that biodiversity is protected and conserved.***
- ***Swifts form an integral part of this urban biodiversity and must be conserved with a view to including provisions for in built boxes in developments going forward as part of the plan.***
- ***In built Swift boxes should be included in any new developments at the IT Carlow Campus.***

Project Ireland 2040 also acknowledges the benefit of green infrastructure ....

### **(“ 3. Takes space back into the public realm**

In the first instance, Carlow County Council plan to deliver more public space, with the aim to encourage more people to spend more time outdoors. Carlow County Council also plans to make public space more responsive to the needs of those who use it. This Strategy seeks to provide plentiful, accessible and exciting public spaces in Carlow Town that are filled with people all day and all year round, providing a fundamental element of urban life. Extended and new riverside pedestrian routes, open spaces, and activities all connected by greatly improved pedestrian/cyclist networks will support this concept alongside a focus on green infrastructure, where Carlow will

seek to find economic opportunities in the greening process. Overall, improving the quality and enhancing the accessibility to public open spaces will result in multiple benefits including health and wellbeing as well as sustainable transport, biodiversity and recreation.”)

The current draft county development plan acknowledges the biodiversity benefits of Green Infrastructure; namely “ • *Improved habitats for wildlife* • *Provision of ecological corridors* • *Landscape permeability* • *Reducing habitat fragmentation* • *Providing a buffer against climate change for habitats and species*”

- ***We must ensure that any further “Green Infrastructure” development within Carlow does not contradict any of these biodiversity benefits.***
- ***We must acknowledge and protect existing green spaces currently providing for and fulfilling the role of Green Infrastructure.***
- ***Existing urban areas within Carlow town which need to be protected from unsuitable developments and acknowledged as currently providing green infrastructure which supports biodiversity and human well-being in open green spaces in an urban environment include those listed below; Green spaces around the old Youth Centre and Castle Rangers FC, Green Space behind/ south of New Oak Boys AFC, Green space east of Eire Og football grounds, Link road south of River Burren and surrounding woods and scrub areas which was never opened, Green Space River Burren Linear walk between railway bridge and new link road that was never opened, River Barrow Tow path full length of county.***
- ***The green space area east of Eire Og, the link road south of the river Burren and surrounding woods and scrub areas which was never opened, the green space between the railway bridge and the new link road that was never opened forming part of the River Burren Linear walk, and the Burren linear walk itself, should all be designated as a high amenity urban area managed for biodiversity and human well-being through the provision of an outdoor space (as is) within a densely populated part of Carlow town.***
- ***The view of the Barrow Valley, Lugnaquilla and the Wicklow mountains, Mt. Leinster and the Blackstairs Mountains, Brandon Hill and Slievenamon, from the elevated ridge to the west side of the county extending from Killeshin and Rossmore in Laois and Clogrenan in Carlow at the north all the way south to Milebush Cross Roads and Coorleagh should be preserved and afforded protection from development which would hinder the view, especially that at 52.711463, -7.051644, where all of the above can be seen from one point.***
- ***Proposed changes in zoning see Figures attached Carlow town Green spaces around the Carlow Youth Centre and Castle Rangers FC to be changed from Business and Innovation to Open Space and Amenity, Green Space south of Woodies to be changed from Retail Warehousing to Open Space and Amenity, and Green Space east of Eire Og to be changed from Enterprise and Employment to Open Space and Amenity.***

#### **Infrastructure (Water/Wastewater and Environmental Services)**

- ***Include the use of Integrated Constructed Wetlands in the process of wastewater treatment in the upgrade of all existing and the creation of new wastewater treatment plants throughout the county, to include public access for recreation and amenity where possible.***

#### **Attachments:**

 CLW-C10-106-1516 - Changes to Zoning Carlow Town\_Open Space and Amenity\_PW.pdf

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## Tourism

The Carlow Tourism strategy and Action Plan 2020-2025 recommends a marketing proposition for County Carlow as: 'A home of Irish heritage and culture - where visitors can discover the stories of Carlow people in spectacular houses and gardens, set amidst scenic mountains and picturesque rivers which provide the backdrop for a diverse range of outdoor activities and other historic and nature-based offerings. Experience Ireland's Ancient East on Dublin's Doorstep'.

While the marketing proposition acknowledges the natural elements provided by the county in terms of "scenic mountains and picturesque rivers", the plan only actually refers to nature once and never actually acknowledges the tourism benefits provided for by biodiversity.

- ***The County Development plan 2022-2028 needs to acknowledge the contribution of and provide facilities for nature based tourism opportunities in Co. Carlow which are made possible by the very biodiversity which sustains them, including those involved in outdoors pursuits primarily based on enjoying the natural environment of Carlow including hillwalkers, birdwatchers, runners, cyclists etc...***
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## Chapter 10: Natural and Built Heritage

### Biodiversity

- ***Improve the conservation status of all natural heritage designated sites including Special Areas of Conservation and proposed Natural Heritage Areas.***
- ***Designate a Biodiversity officer for county Carlow to help implement the Carlow Town Biodiversity Strategy and Action Plan, The All-Ireland Pollinator Plan and any other biodiversity projects etc and so help improve the status of biodiversity within the county.***

### Swifts

#### Background

The **Swift is a Red-listed bird of conservation concern** in Ireland (Gilbert, Stanbury & Lewis, 2021). Swifts come to Ireland's towns to breed, arriving in May and departing in August each year. They are faithful to their nest sites returning to the same one for the duration of their life. These are known as traditional nest sites. The swift exists in our towns without causing any public nuisance. There are never any droppings left under the nests (all droppings are removed by adult birds), making them an ideal town inhabitant, especially as they provide a good service by consuming thousands of flying insects. There is no risk of spread of zoonotic disease or spread of disease to domestic livestock/companion animals.

The Countryside Bird Survey has recorded a steady decline in swifts over many years with the swift showing the third steepest decline among all species monitored (Lewis *et al*, 2020), having declined by over **57% in eighteen years** (Lewis *et al*, 2019). The main cause of this decline is loss of breeding sites (Whelan, Hayes & Caffrey, 2019). They nest in buildings in towns (with all known Carlow nest sites in man-made structures (Webb, 2021). Their traditional nests can usually be found at the top of walls or in cavities in brick work. They gain access to the tops of walls by climbing behind the fascia board. When repairs or renovation work are carried out to roofs and guttering

the birds can no longer gain access to their traditional nesting site. Since swifts live in colonies, repair or renovation work can often affect more than one pair of birds. Swifts now rely on the buildings in our towns for their nest sites. In order to secure the future of swifts, we need to ensure that their traditional nest sites are secured where possible, and to provide new nest sites so that the population can recover.

In order to protect and increase swift numbers nest boxes can be installed at suitable locations, generally in public buildings, like schools and universities. These buildings are in public ownership, so the nest boxes are generally safe from disturbance. In private residences nest boxes are sometimes removed if ownership of the residence changes.

Artificial nest boxes can be used very successfully for swifts if they are placed in the correct location. Nest boxes should be at least 4 metres above ground level and placed such that they do not receive full sun in summer. They would generally be placed facing North or East. There must be a clear flyway in front i.e. no trees or other obstacles. The special entrance to the boxes allow swifts to enter, but exclude other species such as starlings.

In-built artificial nesting cavities are swift boxes specifically designed to be built into the fabric of a new building and provide the most sustainable and long term conservation benefits option for swifts as the cavity provides a nest site for the swifts for the duration of the life of the building. Building in swift boxes may help towards achieving and obtaining the LEED and/or BREEAM building standard for sustainable new construction projects in Ireland.

In addition to the nest boxes installation, a swift attraction call system must also be installed. Speed of occupancy of a nest box can be considerably accelerated by playing swift attraction calls. The attraction calls make the swift think that other swifts are nesting in this location and so indicate that this is an attractive place to breed. Any swift looking for a nest site will explore this area for a vacant place. The sound system should be placed as near as possible to the nest boxes e.g. on a window sill or attached to the box. Swift attraction calls only need to be used until the swifts take up occupancy. Swift attraction calls are operated on a timer - so it doesn't play continuously and can be set to operate outside of work hours.

## **Carlow Town Biodiversity Strategy and Action Plan 2021-2025.**

### **2.3 Flagship Project 3- Save our Swifts**

One of the Flagship Projects (3) identified as part of the plan is 'Save our Swifts'. 4 actions have been listed under the Save our Swifts project. All these actions as proposed should be implemented. Additional actions which are not included but which should be enacted going forward under the Biodiversity Strategy and Action Plan **and** as part of the Carlow County Development Plan 2022-2028 include:

- ***Commission Birdwatch Ireland and the Heritage Council of Ireland to complete a swift survey of County Carlow as a whole including the Greater Carlow Graiguecullen Urban area, all towns and villages, and rural and urban heritage sites to identify all known nesting sites within the county and protect them from inappropriate development which would result in the loss of a nesting site.***
- ***Provide a workshop for architects, planners, heritage officer, etc. to raise awareness of the need to take Swifts into consideration in projects to refurbish old buildings and in new constructions.***
- ***Physically build in Swift boxes to new buildings within the town and county which will provide permanent security for Swift nests into the future.***
- ***Include planning provisions for the requirement of environmentally sustainable in-built nest boxes for bats and swifts to encourage urban biodiversity in largescale new developments within the county such as any extensions to the IT Carlow Campus and Technological University, Carlow College St. Patrick's,***

*any other third level institutions, secondary schools and primary schools with a particular focus on urban areas.*

- *Legal protection of existing swift colonies in public and council owned buildings.*
- *Buildings which are of natural and cultural heritage importance for the preservation of swift nest sites which should be afforded protection include The Carlow Youth Centre (Glendale Avenue, Carlow Town), Carlow College St. Patrick's, St. Dymphna's Hospital, Old Perry's Cash and Carry (Kennedy Street, Carlow Town), Leinster Crescent (Dublin Road, Carlow Town), Cullen's Mill (Leighlinbridge), The Old Mill (Church Street, Leighlinbridge), The Black Castle (Leighlinbridge), Old National School (Ballon), Altamont Gardens Stone Farm Outhouses, Saint Columba's National School (Tullow), Scoil Phádraig Naofa (Tullow), St. Brigid's Church (Clonegal).*

This is now more important than ever in the midst of a Climate and Biodiversity Emergency, as Swifts are now **Red-listed birds of conservation concern having declined by over 57% in eighteen years** (Lewis *et al*, 2019), with all known Carlow nest sites in man-made structures (Webb, 2021).

- *Support the establishment of the Greater Carlow Graiguecullen Urban area as a 'Swift City' to be the first of its kind in the Republic of Ireland following the lead of the Belfast Swift city initiative, the first of its kind in the world, which will help promote the conservation work being undertaken for this species and other biodiversity within Carlow and provide for the increase in numbers of swifts further promoting nature based tourism opportunities within Carlow.*

## Peatlands

- *Provide for the protection of non-statutory listed but nonetheless natural heritage sites of biodiversity, conservation and cultural heritage importance, including but not limited to the Drummin Bog and Bolyvannan/Red Bog at Tomard upper.*

Tomard wood is a conifer plantation owned by Coillte in the northwest of Carlow. This woods borders the Red Bog or Bolyvannan Bog. Historically turf was cut on this bog which has since ceased and conifers have been planted right up to the high bog. The bog immediately borders Coillte lands and may even lie within the lands owned by Coillte. A private conifer plantation borders the other side of the bog where Bilboa windfarm is currently planned.

There are **Marsh Fritillary** ((Habitats Directive (92/43/EEC), Annex II, Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) Appendix II) butterflies present around the bog with breeding confirmed within close proximity to the high bog on previously cutover and planted Coillte lands. Historically, locals remember **Red Grouse** (Birds of Conservation Concern (BOCCI- Red List, EU Birds Directive - Protected Species Annex II, Section I, Annex III, Section I) present in the area while **Golden Plover** (BOCCI - Red List, EU Birds Directive - Protected Species Annex I), **Common Snipe, Woodcock, Swifts, Kestrel** (all BOCCI - Red List) are regularly seen in the area. There are recent historical records of **Hen Harrier** (BOCCI - Amber List, EU Birds Directive - Protected Species Annex I) in the area too.

*Coillte natures mission includes:*

*Restoring important biodiversity areas by investing in major habitat improvements*

Peatland environments are rare in Carlow especially in the west of the county. There is an opportunity for Carlow County Council under the new development plan and Coillte being a large landowner in the area to bring about positive change in this area restoring lost biodiversity and sequestering carbon emissions through bog rehabilitation.

- ***I would like to see an active effort by the council and Coillte in this area to help restore native biodiversity to this bog and help rehabilitate the site. Communication and cooperation between the county council and Coillte with adjoining landowners and the planned Bilboa windfarm project, but perhaps most importantly the local community, could help bring about positive change for the benefit of the environment and the preservation of both our cultural and natural heritage in the midst of a climate and biodiversity emergency.***

Examples of management could include keeping conifers back from the bog and efforts made to restore the water holding capacity of the peatland environment. Encroaching spruce should be removed. Habitat management for Devil's-bit Scabious the foodplant of the Marsh Fritillary.

#### **All-Ireland Pollinator Plan**

- ***Enact the all-Ireland Pollinator plan on public lands to include but not limited to public parks, public roads (roundabouts, road verges), public buildings and grounds (Duckett's Grove etc where possible.***

#### **Invasive Species**

- ***Survey and implement a plan to remove all invasive alien species (including Himalayan Balsam, Japanese Knotweed, Winter Heliotrope etc...) from our native waterways which are currently contributing to the decline of native biodiversity here and the very structural integrity of our waterways.***

#### **Flood Protection**

- ***Ensure the protection of the river Barrow floodplains which currently provide annual flood attenuation relief for Carlow Town, Leighlinbridge, Bagenalstown, Goresbridge, Borris and Graiguenamanagh while also providing seasonal habitat for nationally important wintering numbers of wetland birds such as Golden Plover (Red-listed and Annex I) and Lapwing (Red-listed), allowing the river to maintain its current flooding patterns. This will require careful consideration of any development within the footprint of the river and Special Area of Conservation.***
- ***Assess the feasibility of providing financial relief (acknowledgement) to landowners whose lands are periodically flooded providing this flood attenuation relief (for the residents of the Barrow valley) and***

***biodiversity resource without the need for any infrastructural flood relief developments.***

- ***The use of natural flood mitigation strategies over hard infrastructure with a view to providing habitats for wildlife while protecting human livelihoods and centres of urban conurbations.***

#### **Barrow Track**

- ***No further development of the Barrow Blueway idea. Maintain the Barrow towpath as is and has functioned for the past 100 plus years as a natural vegetation riverbank walkway.***
- ***The track itself provides habitat for many floral species as well as feeding opportunities for protected avian waterbird species such as Snipe (Red-listed), Green Sandpiper, Grey Heron, Little Egret, Moorhen, Little Grebe as well as otters which cannot feed on a manmade gravel, grit, tarmac or similar surface.***

#### **Barn Owls**

- ***Rectify the issue of collision hit Barn Owls (Red-listed species) along the course of the M9 motorway within Carlow. 9 barn owls and long-eared Owls have been killed in the last 12 months.***

#### **References**

Webb, P., 2021. *A survey of Swift (Apus apus) nesting sites in county Carlow 2018/19/20.* [pdf] Available at: <  
[https://www.swiftconservation.ie/wp-content/uploads/2021/03/Co.-Carlow-Swift-Report-2018\\_2019\\_2020-1.pdf](https://www.swiftconservation.ie/wp-content/uploads/2021/03/Co.-Carlow-Swift-Report-2018_2019_2020-1.pdf) >

Lewis, L. J., Coombes, D., Burke, B., O'Halloran, J., Walsh, A., Tierney, T. D. & Cummins, S. (2019) Countryside Bird Survey: Status and trends of common and widespread breeding birds 1998-2016. *Irish Wildlife Manuals, No. 115*. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland.

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Lewis, L. J., Coombes, R. H., Burke, B., Tierney, T. D., Cummins, S., Walsh, A. J., Ryan, N. & O'Halloran, J., 2020. Countryside Bird Survey Report 1998-2019. *BirdWatch Ireland*. Wicklow.

Whelan, R., Hayes, W. & Caffrey, B., 2019. *Saving Swifts*. Publication funded by The Department of Culture, Heritage and the Gaeltacht through the National Parks and Wildlife Service's National Biodiversity Action Plan Fund.

Scott Cawley, 2021. *Carlow Town Biodiversity Strategy & Action Plan 2021-2025*. Carlow County Council, Carlow Town Development Forum, Department of Housing, Local Government and Heritage.

Future Analytics, 2020. *County Carlow Tourism Strategy and Action Plan 2020-2025*. Carlow Tourism, Carlow County Council.

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**Teorainneacha Gafa ar an léarscáil: Níl**