



**Uimhir Thagarta Uathúil:** CLW-C10-117

**Údar:** Rosemary Rooney

**Stádas:** Submitted

**Aighneacht:** Draft Carlow County Development Plan 2022-2028

**Comhairliúchán:**

Draft Carlow County Development Plan 2022-2028

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## VI. Renewable Energy Strategy

**Caibidil:** Volume 2 - Appendices» VI. Renewable Energy  
Strategy

Senior Executive Officer Planning Department Carlow County Council Athy Road  
Carlow

1st October 2021

Re: Draft Carlow County Development Plan 2022-2028

Dear Sir/ Madam,

I would like to acknowledge the effort made by Carlow County Council in the development of this draft County Development Plan (CBD) and welcome the opportunity to make a submission.

### RENEWABLE ENERGY STRATEGY (RES)

The inclusion of an updated RES for the county is most welcome. I would however like to make some observations:

1. In my opinion the CDP wind energy policy needs to be strengthened in order to protect our Upland habitats. The statement: "windfarm development in the more elevated Uplands Landscape type not normally permissible" is weak and ambiguous and refers only to the Landscape Character Assessment. While the visual impact of these industrial turbines is an important consideration a much more important issue is the detrimental ecological impact of these structures on our Upland habitats, biodiversity and water quality, which can only be avoided by making our Uplands a "No Go" area for windfarms. This needs to be discussed in more detail in the plan and a stronger less ambiguous form of wording applied.

Given that we are in the midst of a dual crisis of climate change and biodiversity loss, decarbonisation cannot be pursued to the detriment of our struggling biodiversity. While renewable energy facilities can be placed in a range of locations biodiversity cannot be relocated - this unique upland environment can never be replaced if it is destroyed. It

makes no sense to put gigantic and environmentally destructive wind turbines on land in one of the most scenic and ecologically valuable parts of Ireland when a much more efficient and environmentally sensitive technology will soon be available offshore.

2. is well on target to meet its 70/30 objectives - the Carlow granting of planning permission for a 95MW solar farm in on 25/9/2021 goes a long way towards achieving the 2030 goal of 130MW and enabling Carlow to make a significant and fair contribution to the state's renewable energy requirement.

The the over-riding priority for the county therefore is the need to address the urgent biodiversity crisis.

3.Coillte Renewable Energy's Submission to the CDP (CLW-C10-26)

effectively makes the case for opening up the whole of the Blackstairs Uplands to industrial wind farm development. They suggest that visually sensitive Upland landscapes should not be precluded from wind farm developments while making no reference at all to the ecological sensitivity of these Uplands.

This makes it all the more crucial for Carlow County Council to hold firm and protect our Uplands for future generations. This would require a clear and unambiguous policy in relation to windfarm development in our Uplands. The statement " windfarm development in the more elevated Uplands Landscape type not normally permissible" does not go far enough. The only failsafe way to protect our Blackstairs Uplands is to make them a "No Go" area for windfarms or industrialisation of any sort.

4. It would make sense to site solar farms on large brownfield sites sites in close proximity to areas with the greatest energy demands - industry and data centres, as well as close to a grid connection - the Irish Sugar Factory site would be an ideal choice. This would avoiding habitat and biodiversity loss associated with a green field site.

## NATURAL HERITAGE/ GREEN INFRASTRUCTURE

I welcome and support the the CDP's proposals in relation to Green Infrastructure and Natural Heritage and would like to suggest the following additions:

1. A commitment by Carlow County Council should be made to develop a Local Biodiversity Action Plan no later than 2022.

Given that we are experiencing unprecedented losses of biodiversity, both globally and nationally, action is needed in every county at local level if we are to slow down and stop the rate at which species and habitats are being lost.

2. While the recent appointment of a Heritage Officer is very welcome a Biodiversity Officer needs to be appointed as a matter of urgency.

3. Carlow County Council should work with Coillte to adopt a more biodiversity friendly approach to forestry, such as Continuous Coverage Forestry and Bioforestry, which would include up to 20% native broadleaf planting in each commercial forest. In addition broadleaves could be planted along Riparian Buffer Zones and walkway/ road edges. All of these measures would work as vital wildlife corridors.

4. Croaghaun Mountain needs to be included as a pNHA in the Blackstairs map.

5. A commitment should be made to restore our ecosystems - to go beyond a 'no net loss of biodiversity' approach and to aim for a net gain.

We in Carlow are fortunate enough to possess a massive Special Area of Conservation on our Blackstairs Uplands comprising 5000 Ha of Annex 1 Dry Heath, one of the most threatened habitats in Europe. These Uplands are also the source of many mountain rivers which run into the Slaney, Barrow and Nore SAC rivers.

95 bird species including 15 Red Listed critically endangered species and 29 Amber Listed birds of major conservation concern have been observed in and around the Blackstairs, as well as 68 other species of flora and fauna of conservation concern.

Ireland is a Party to the UN Convention on Biological Diversity which in January 2021 committed to protecting at least 30% of the world's land and oceans by 2030 in an attempt to halt the dual crises of climate change and biodiversity loss (30 x 30 goals). Currently only 13% of Ireland is protected, well below this target of 30%

Carlow is ideally positioned to make its contribution to this 30x30 target through an ecological restoration programme of the Blackstairs. Such a programme would align with the goals of the EU Action Plan for restoration and conservation of Annex 1 Dry Heath, the UN Decade of Ecosystem Restoration and the EU Biodiversity Strategy for 2030.

By restoring rather than industrialising these Uplands ecological restoration would make a significant and positive contribution to our biodiversity crisis while also mitigating climate change - a Nature - based Solution to Climate Control. It would also offer a Just Transition by boosting amenity value and providing sustainable economic opportunities for the local community.

Finally an ecological restoration programme could also form the foundation of the new County Carlow Local Biodiversity Action Plan.

Yours sincerely,

Rosemary Rooney

