

Senior Executive Officer

Draft Carlow Development Plan 2022-2028

Planning and Development

Carlow Co Council

Athy Rd

Carlow.

1st October 2021

A Chara,

Save Mount Leinster is a community group that was formed to protect the Blackstairs Uplands from industrial development. It is formed from a diverse group of local residents who Live, Work and Farm on the Blackstairs Mountain Range. We have over 3200 signatures on our uplift campaign that support our opposition to industrial development on the Blackstairs Uplands.

On behalf of the Save Mt Leinster Group, we welcome the opportunity afforded to us to submit the following observation on the draft Carlow County Development Plan 2022-2028. The inclusion of an updated Renewable Energy Strategy for the county is most welcome.

We acknowledge the Councils comprehensive work on the Draft development plan and would like to make the following comments:

Proposal 1: Carlow CO CO make provision for the inclusion of a Conservation and Management Plan for the Black Stairs in conjunction with Wexford Co Council, NWPS and all relevant stake holders similar to that being currently prepared for the Curragh Plains in Co Kildare.

Reason to Ensure the Management and Protection of the Blackstairs is coordinated, promote sustainable visitor attraction and experience on the Mountain Range, Biodiversity is protected and enhanced , to enhance the rural environment for those that live ,work and visit on the Blackstairs

Proposal WE P4: Maintain the Not normally Permissible in Uplands as an area unsuitable for wind energy and include the clause that Wind Energy applications in these areas will be looked on unfavourably as in the Wexford Draft Development Plan . Clear Definition of not normally permissible?

Reason; To Ensure Proper Planning and avoid potential Culminative negative impacts with the adjoining wind infrastructure in Co Wexford, incur unnecessary expense on the Co Council and Developer. In Addition, there is no requirement for additional energy requirement in Carlow during the life time of the 2022-2028 plan given the recent consented renewable energy developments in Carlow the county is on track to exceed its 130MW target by 2030. To afford

protection to the designated SAC and PNHAs and the areas outside that are rich in Flora and Fauna and Annex 1 Habitat.

With reference to Coillte 28/09/2021 Submission on Wind Energy. We respect that Carlow Council are the responsible Authority for Energy Policy in the County and for the valid reasons in the refusal of the planning application CW 21/13 will not entertain their spurious claims for amendment to the WE P4. Coillte seem to have no understanding of the fact that Carlow is the second smallest county in the country and the area with the greatest wind speed is the most unsuitable location for turbines due to the Rich and Diverse Habitat and Species present. Further more Carlow has the right to protect its people and Environment and can easily demonstrate that they are on track to reach their 2030 targets.

With over 25 times the population of Carlow, Dublin has no Wind Farm we have nine wind farms in the Bunclody/ Carrickduff area. The Planning Regulator cannot allow Disadvantaged rural Ireland to become a Dumping ground for some other counties problems.

Chapter 9: Landscape and Green Infrastructure

We would ask that the following wording amendments be made to the Landscape Policies;

LA. P1

Protect and maintain the overall integrity of the County's landscape, by recognising its capacity to sustainably integrate and absorb **appropriate** development, and by ensuring that development protects, retains and, where necessary, enhances the appearance and character of the landscape, and does not unduly damage or detract from those features which contribute to its value, character, distinctiveness and sensitivity e.g. landform, habitats, scenic quality, settlement pattern, historic heritage, amenity, land use and tranquillity.

LA. P2

Ensure that development will not have a disproportionate landscape or visual impact in sensitive upland areas of the County (due to siting, layout, design or excessive scale, **height** and bulk) and will not significantly interfere with or detract from scenic upland vistas, when viewed from the surrounding environment, including nearby areas, scenic views and routes, and from settlements.

LA. P4

Ensure that developments on steep slopes or ridges will not be conspicuous or have disproportionate landscape or visual impacts when viewed from the surrounding environment, including from nearby areas, scenic views and routes, and from settlements. **Ensure that foundations for large scale developments will not adversely affect ground conditions and water quality, biodiversity and environments for wildlife.**

LA. P5

Protect and maintain the landscape quality and visual integrity of river valleys and river corridors, and to ensure development in these sensitive landscape areas does not adversely affect or detract from scenic views, including views from bridges, or from distinct linear sections such as open floodplains. **Protect water quality, biodiversity and environments for wildlife.**

LA. P7

Facilitate **(in areas of low sensitivity and high capacity)**, where appropriate, developments that have a functional and locational requirement to be situated on steep or elevated sites (e.g. reservoir, telecommunication masts or wind energy structures) where residual adverse visual impacts are minimised or mitigated.

LA. P10

Ensure that features which contribute to local landscape character, including historic features and buildings, ~~trees~~ **mixed broadleaf and indigenous forestry**, hedgerows, shelter belts and stone walls, are retained, protected, and enhanced where appropriate, so as to preserve the appearance and local landscape character of an area, whilst supporting sustainable landscape change and development. Development proposals necessitating the removal of such features will be discouraged.

Proposal Green Infrastructure Blackstairs

Develop a Green Infrastructure proposal in Conjunction with Coillte through their estate to re-open the Historic Cranmore to Kilbrannish path from there to Identify the Cup and Saucer at Langford's forest continue on to the large Granite Glacial Bolder Deposit and up to the Black Banks Viewing point and from there to the nine stones and link down to the arachnological features in Crannagh . In addition to promote Continuous Cover Forestry and Native Woodland Buffer In addition to Riparian Buffer Zones and Road Edges the forest roads should get the same treatment with mixed species plantation for 40/50 M that would become long term mixed wood lands and retain the commercial wood land behind these screens

Reason :

Improved Outdoor recreation, , Enhancing the existing environment and creating a nature highway

Chapter 10: Natural and Built Heritage

We would draw your attention to map 10.2 Proposed Natural Heritage Areas which includes 000700 Blackstairs Mountain range, however, the highlighted area on the map excludes Croaghaun Mountain which is the most northerly point of the range.

The pNHA must be extended to the whole of the Blackstairs & Mount Leinster Uplands in order to protect flora, fauna and the Mount Leinster Heritage Drive from inappropriate development.

Proposal: Formulate Biodiversity Plan in Year one (2022) of the County Development Plan

Reason : To Inform Planning and Decision making in the County Council and Ensure that the Council puts the Biodiversity Crises on an equal footing to the Climate Crises. It is an Acknowledged Dual Crises.

Propose Historic Landscape Assessment of County Carlow with particular focus on the Blackstairs

Reason To Assess Extensive and Until recently and Potentially unknown Archaeological heritage in the Blackstairs

Propose Alternation NH P2 Ensure that developments there is no Net loss to Biodiversity Reason it Covers all and it good practice

6.1 Wind Energy

The statement that “windfarm development in the more elevated Uplands Landscape type not normally permissible” needs further detail and clarification for both developers and members of the public. “Not Normally Permissible” is unacceptably ambiguous and we would draw your attention to a parallel statement contained in the RES of a neighbouring CDP and ask that a similar definition is included in Carlow’s RES.

The maximum distance of 15km for grid connection from source to substation for all renewable energy developments needs to be maintained .

Reason :to protect further encroachment on habitat and ensure generation is where the demand and infrastructure is

We would suggest that a number of amendments/additions are required to the wording of the RES as follows:

- Pg 23, 3.6.2: particularly sensitive receptors such as **housing**, schools and hospitals,
- Pg 24, 3.6.3: Proposed renewable energy developments should be assessed for their impact on sensitive landscapes and **measures put in place to minimise the impact on visual amenities within the county should not be located in areas of high sensitivity and low capacity which would contravene the LCA**
- Pg 24, 3.6.5: **The carbon cost of material supply & construction must be considered when assessing the impact of renewable energy development.**

- Pg 37, 6.1.5: Wind Speed – using data presented in the SEAI Wind Energy Atlas, wind speed contours for the County have been plotted (see **Figure 6-2**). **The Uplands area with high wind speed has a LCA of high sensitivity to & low capacity for windfarm development.**
- Pg 40, 6.1.5.3: Extensions to existing wind farms
One way to further avail of the wind energy resource in the county is to extend existing wind farms by adding new turbines, **except in areas of high sensitivity and low capacity which would contravene the LCA**. A site by site analysis of potential for extensions has not been carried out for this RES.
- Pg 40, 6.1.5.4: Repowering existing wind farms , **except in areas of high sensitivity and low capacity which would contravene the LCA**
- Pg 42, 6.1.5.5: Opportunities for new wind farms in lowland areas, extensions to existing wind farms and repowering of existing wind farms may be considered, but the environmental constraints and visual and landscape sensitivity need to be carefully considered on a case by case basis **but will not be permissible in areas of high sensitivity and low capacity which would contravene the LCA**.
- Pg 42, 6.1.6 : Policy W1.2
Support the re-powering of existing wind farms when they come to the end of their operational life, and extensions to existing wind farms, subject to assessment on a case by case basis **with the exception of those in areas of high sensitivity and low capacity.**

We request that the council executive give our submission careful and measured consideration.

Yours faithfully,

By Email

Joe Kirwan
Chairperson Save Mount Leinster