

**ICOMOS National Scientific Committee on Cultural Landscapes
Observations on DRAFT Carlow Development Plan 2022 - 2028**

We welcome the opportunity to comment on the Draft Development Plan for County Carlow 2022 – 2028 which demonstrates an appreciation for the scenic and biodiverse cultural landscape of the county.

The heritage of Ireland both cultural and natural is the story of the land and its people. To protect the integrity of the landscape is, to take care of our own well-being in the present, to value our past, and to prepare for the well-being and prosperity of future generations.

We consider that:

the Landscape Character Assessment and Addendum (Appendix 7), is a careful, considered, and informed assessment of the landscapes of Carlow, providing tools to guide development, to raise awareness, and to care for the evolution of the landscape over time, and places a ‘renewed emphasis on the significance and sensitivity of landscape resources for the people of Carlow’ (Appendix 7, p.3);

the continuing designation of the Blackstairs and Mount Leinster Uplands as a landscape of high sensitivity to development and low capacity for wind farms is appropriate and accordingly, we welcome and support Wind Energy Policy 4:

WE. P4:

Wind farm development will not normally be permissible in the Uplands Landscape Type as shown in Figure 6 of the Carlow County Landscape Character Assessment included as Appendix VII to this Plan. This provision shall not apply to micro energy generation and community energy projects as provided for in Section 7.10.3.5, where deemed appropriate and subject to compliance with proper planning and environmental considerations.

Accumulation may be a cause for concern in areas of high sensitivity; Wind Energy Policy 2 allows for the extension of existing developments, subject to compliance:

WE. P2:

Support the re-powering of existing wind farms when they come to the end of their operational life and extension to existing wind farms, subject to compliance with proper planning and environmental considerations.

Where windfarms exist in areas of high sensitivity, having received permission prior to the LCA of 2008, there is a concern that extending or re-powering such wind farms would allow an accumulation to occur; and further development relying on precedent, all to the detriment of the highly sensitive and significant cultural and



natural landscape.

We welcome and support the proposal (Appendix 7 Carlow Landscape Character Assessment & Addendum, p.8) that a Historic Landscape Characterisation (HLC) of County Carlow be carried out during the lifetime of the plan in key areas; and we suggest that two other key areas in the uplands be added: the extensive archaeological heritage of the Blackstairs; the unique drystone-wall field boundary landscape of upland farms. The importance of both areas are revealed by recent scholarship:

“Uplands were an integral part of Irish life in the past. They were places of refuge, of settlement, of ceremonial activity and of reflection. These activities were intertwined with those carried out in the lowlands..... One glance at aerial photographs for many of these areas shows unrecorded field walls running across the terrain, suggesting the presence of further unidentified features. An increase of 70 new features recognised on Dranagh Mountain suggests that the current SMR record is merely the tip of the iceberg when it comes to the true number of surviving features in the Blackstairs as a whole”

Ó Murchú. Seamus, ‘Archaeology among the Blackthorns’ *The Journal of Irish Archaeology* 2012, Vol. 21 (2012), pp. 35-55 Published by: Wordwell Ltd.

Laheen, Mary, & Fitzgerald, Helena, ‘Granite Dry Stone Walls and Ditches of The Blackstairs in South Carlow’ Report commissioned by The Heritage Council in 2014. (copy attached). We suggest that the exceptional granite drystone walls of Carlow be added to the list of good examples of vernacular architecture at VA.01.

We support the general Natural Heritage Policies of Chapter 10, NH P1 to NH P10, and in particular the recognition that biodiverse areas extend beyond the boundaries of designated areas.

We support and welcome NH.01:

NH.01

Prepare a County Heritage Plan and Biodiversity Action Plan during the lifetime of the Plan to ensure the protection and appreciation of heritage and nature at local level including recognition of rich biodiversity of designation of existing special areas of conservation i.e. Blackstairs Mountains, Slaney River Valley and River Barrow and River Nore SAC.

And consider that it should include the particular inter-relationship between biodiversity and traditional farming in upland areas, where nature and culture work together creating a continuing and evolving cultural landscape.

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We support the ideas expressed in paragraph 3.6.5 Air Quality and Climate:

Renewable energy provides a cleaner alternative to conventional generation in terms of reduced impact on air quality and climate. Although the renewable energy generation itself does not typically produce harmful emissions or CO₂, there is potential for such during the operating life cycle of the development. The construction, operation and decommissioning stages must be considered when assessing the impact of the development on air quality and climate, with projects aiming to minimize the release of CO₂.....

We recommend that these carbon costs in construction, operation and decommissioning, should be calculated by developers and included in planning applications, in order that a proper assessment of carbon emission reduction can be made.

Conclusion

The Blackstairs and the Mount Leinster Uplands is an area of exceptional natural and cultural heritage in the county; it is important to local communities in terms of amenity, farming and tourism, and all sorts of other ways. Due to relatively higher wind speeds, the area is also attractive to wind farm developers. The landscape character assessment describes the Blackstairs and Mount Leinster Uplands as a landscape of high sensitivity and low capacity for wind farm development. For this reason the Draft Development Plan, quite rightly states, that wind farm development will not normally be permissible in the area (WE.P4).

The Plan balances the demands of providing renewable energy in the form of Onshore Wind with the responsibility of guiding development in and near, sensitive landscapes. The approach shows foresight and consideration of all of the factors at play in this complex and layered situation. It is important to remember that the development of Offshore Wind energy, which is believed to have much greater potential and capacity, is currently being considered and supported by government.

Landscape and people are the bedrock of tourism and heritage, farming and other industry. Sustainable management of cultural and natural landscape is critical for increasing biodiversity and mitigating climate change for the future.

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