



**Uimhir Thagarta Uathúil:** KCC-C55-418

**Údar:** Kildare Town Tidy Towns

**Stádas:** Submitted

**Aighneacht:**

SUBMISSION ON CHAPTER 12 BIODIVERSITY AND GREEN  
INFRASTRUCTURE ON THE DRAFT KILDARE COUNTY  
DEVELOPMENT PLAN

**Comhairliúchán:**

Draft Kildare County Development Plan 2023 - 2029

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## 12 - Biodiversity & Green Infrastructure

**Caibidil:** Volume 1 - chapters » 12 - Biodiversity & Green  
Infrastructure

**Ábhair:** biodiversity

### How can development impact on biodiversity?

Any development such as new houses, industrial complexes and infrastructure can have the potential to have negative impacts on biological diversity if not planned properly. However sensitive development can enhance biodiversity and can help to avoid or mitigate many of these impacts. Some of the impacts of development on biodiversity are set out briefly below. It is therefore of critical importance that Kildare Co. Council considers the following, in the new development plan, in light of the Biodiversity Crisis facing the planet, which has been recognised by Kildare Co. Council.

### The key areas of concern re. Biodiversity loss in Co. Kildare

**Direct loss of habitats of ecological value** this has the most serious impact on biodiversity in Kildare.

Species of plants and animals rely on various habitat types to provide them with food and shelter and to ensure their survival. Loss of these habitats of ecological value and which may be nationally, regionally or locally rare can have significant effects on populations of plants and animal species dependant on these habitats.

Kildare County Council have outlined commitment to in the draft County development plan to as a matter of policy (BI P5),

**BI P5** Identify and conserve locally important biodiversity sites in the county which contribute to the overall ecological network of County Kildare.

- It is important that all such sites selected as locally important biodiversity sites are given serious consideration in all planning applications to prevent any further loss to biodiversity and to ensure conservation of these areas as a matter of priority to prevent loss of such sites due to development.

I am strongly in favour of the Council's proposed actions as follows

**BI A7** Identify and map County Biodiversity Sites in cooperation with the relevant statutory agencies, other relevant groups and the general public, not otherwise protected by legislation.

**BI A8** Develop Management Plans for County Biodiversity Sites where appropriate.

**BI A9** Support the development, where appropriate and feasible, of biodiversity awareness signage in the county.

**BI A10** Work with Teagasc and landowners throughout the county in order to identify suitable 'Hare's Corner' projects which would create pocket sized habitats in order to enhance biodiversity

The Council have also noted that in the draft development plan that wetlands listed in their inventory of wetland of biodiversity value in the County will receive special consideration in the planning process. I strongly welcome this as such areas are very important sites for biodiversity in a local context and need string protection.

Therefore I support the following;

**BI P8** Ensure that Kildare's wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention.

Objectives It is an objective of the Council to:

**BI O31** Protect wetland sites that have been rated A (International), B (National) C+ (County) and C (Local) importance as identified in the County Kildare Wetlands Survey 2012-2014, (See Tables 12.5 & 12.6). **BI O32** Prevent infilling and drainage, where possible, of wetlands identified as part of the County Kildare Wetland Survey 2012-2014, (See Table 12.6).

**BI O33** Ensure that an ecological assessment undertaken in conjunction with proposals involving drainage or reclamation of wetland identified in Table 12.6. Impact assessment of all developments on peatlands shall consider peatland stability, carbon emissions balance, Hydrology and Ecology.

**BI O34** Support the implementation of the recommendations of the National Peatlands Strategy 2015, as they relate to County Kildare

## Recommendations

- I would also suggest that the Council consider as an action identifying areas of **biodiversity/wildlife hotspots** that is areas of the County which have high numbers of County Biodiversity Sites in proximity to one another or which are linked through biodiversity corridors, eg. watercourses, significant hedgerows, or marginal habitats.
- I suggest that the Council considers placing primacy value on **natural regeneration** as a method of re-wilding biodiversity sites, rather than significant planting activities.
- I propose that the Council develops a suite of best practice guidance/toolkit for management of various habitats which occur commonly throughout the County for example small areas of marsh vegetation or ponds.
- I would also support the development of a large scale ecological hub centred on the National Peatland Park centred on old Bord Na Mona lands in west Kildare and that this would support the development of a nationally important biodiversity hub and an exemplar of bogland restoration.
- I would suggest that the council conduct a wider survey to include any other wetland sites in the County which may have been missed by the initial surveys of wetland sites and that such sites once included on the list also receive the same consideration in the planning process as the already listed sites.
- I would suggest that areas where wetland sites are hydrologically linked through ground water or connecting watercourses be identified as wetland hotspots and if of significant extent that their cumulative biodiversity is

recognised as important for conservation.

**Habitat fragmentation** is caused by changes of land use, or by the splitting of large areas of a particular habitat type, until only smaller fragments of the original habitat remain. The effect tends to cause a reduction in biological diversity.

**Loss of ecological connectivity** between habitat types is caused by the removal of linear biological features, and small patches of habitats of ecological value which allow movement of wild plant and animal species through the natural landscape (eg removal of field boundaries including banks, ditches and hedgerows). Linear developments such as roads, or large scale enclosure (fencing) can also reduce the ability of plant and animal species to move between sites, or particular habitat types, to occupy new niches, or to access habitats essential for different stages in their life cycle.

In relation to the threats to biodiversity as outlined above habitats fragmentation and loss of Ecological Connectivity, I fully support the following Policy, Objectives and Actions of the proposed County Development Plan as outlined here below.

**BI P1** Integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including mitigation and/or compensation measures, as appropriate.

Objectives It is an objective of the Council to:

**BI O1** Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development.

**BI O2** Encourage and promote the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access.

**BI O3** Actively support the implementation of national biodiversity initiatives such as the All-Ireland Pollinator Plan 2021-2026

**BI O4** Promote increased public participation in biodiversity conservation by supporting and encouraging community-led initiatives such as native tree planting, the removal of invasive species and the continued preparation of Local Biodiversity Actions Plans for settlements in County Kildare<sup>1</sup>.

Actions It is an action of the Council to:

**BI A1** Continue to implement natural heritage actions in the County Heritage Plan 2019-2025, the County Biodiversity Plan, the National Biodiversity Action Plan 2017 – 2021 and any subsequent plans, in partnership with the Department of Housing, Heritage and Local Government, relevant stakeholders and the community.

**BI A2** Carry out habitat mapping on a phased basis and integrate biodiversity considerations and protection measures into the suite of mandatory Local Area Plans and to develop specific policies and objectives that could be incorporated into council programmes and activities.

**BI A3** Review the County Kildare Biodiversity Plan within the lifetime of this Plan. **BI A4** Continue to prepare and roll-out Local Biodiversity Action Plans on an annual basis, in partnership, where appropriate with LEADER, subject to funding.

**BI A5** Engage with Residents Associations to educate and encourage the roll out of the Pollinator and Biodiversity Plans, specifically working towards less spraying and more pollinator friendly practices.

## Recommendations

I would strongly recommend that

**BI O1** Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development.

- States that *In light of the Biodiversity Crisis the Council*, require, as part of the Development Management Process.....
- I also recommend that the Council highlight the **equal primacy** of the biodiversity crisis with the climate crisis and ensure that **equal weight is given to the protection of biodiversity** value in County Kildare as is given to the support for Climate actions and infrastructural development. We cannot let a rush to mitigate one crisis impact in a significant way on highly vulnerable habitats and networks of habitats.

**Disturbance to species** can arise where development causes the avoidance or abandonment of breeding, resting or feeding areas by particular species because of increased human or other disturbance. For instance, populations of birds subject to continual levels of disturbance caused by the development of, renewable energy infrastructure, including wind and solar arrays close to important feeding or breeding sites, may end up avoiding particular sites or locations. Disturbance can also be caused by the generation of noise or vibrations, or by the introduction of lighting in inappropriate areas. Such disturbance can have impacts on the wellbeing of populations of some species. Impacts on water and air quality Development projects can give rise to atmospheric pollution and pollution of waterways or water bodies.

I am strongly supportive of the Council's overall policy and objectives as outlined here below.

**BI P4** Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law.

Objectives It is an objective of the Council to:

**BI O10** Ensure that any new development proposal does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2012, the Birds Directive 1979 the Habitats Directive 1992 and the Flora Protection Order species.

**BI O11** Ensure appropriate species and habitat avoidance and mitigation measures are incorporated into all new development proposals.

**BI O12** Possibly require a derogation licence, issued by the DHLGH, in the event of a proposed development impacting on a site known to be a breeding or resting site of species listed in the Habitats Regulations or the Wildlife Acts 1976 - 2012.

**BI O13** Require all applications for new developments to identify, protect and sensitively enhance the most important ecological features and habitats, and incorporate these into the overall open space network, keeping free from development and to provide links to the wider Green Infrastructure network as an essential part of the design process and by making provision for local biodiversity (e.g. through provision of swift boxes or towers, bat roost sites, hedgehog highways, green roofs, etc.).

In addition the Council highlights the importance of the conservation trees and hedgerows which I also strongly support.

**BI P6** Recognise the important contribution trees and hedgerows make to the county biodiversity resource climate mitigation, resilience and adaptation.

Objectives It is an objective of the Council to:

**BI O15** Prevent, in the first instance, the removal of hedgerows to facilitate development. Where their removal is unavoidable, same must be clearly and satisfactorily demonstrated to the Planning Authority. In any event, removal shall be kept to an absolute minimum and there shall be a requirement for mitigation planting comprising a hedge of similar length and species composition to the original, established as close as is practicable to the original and where possible linking to existing adjacent hedges. Native plants of a local provenance should be used for any such planting. Removal of hedgerows and trees prior to submitting a planning application will be viewed negatively by the planning authority and may result in an outright refusal.

**BI O16** Promote the integration of boundary hedges within and along development sites into development design so as to avoid “trapped hedges” located to the boundary of houses within the development layout. Encourage the planting of woodlands, trees and hedgerows as part of new developments and as part of the Council’s own landscaping works using native plants of local provenance.

**BI O17** Require the undertaking of a comprehensive tree survey carried out by a suitably qualified arborist where development proposals require felling of mature trees; the tree survey shall assess the condition, ecological and amenity value of the tree stock proposed for removal as well as mitigation planting and a management scheme. It should be noted that rotting and decaying trees are an integral part of a woodland ecosystem and can host a range of fungi and invertebrates, important for biodiversity. While single or avenue trees that are decaying may be removed, others that are part of group or cluster may be subject to retention.

**BI O18** Ensure a Tree Management Plan is provided to ensure that trees are adequately protected during development and incorporated into the design of new developments. **BI O19** Restrict the cutting of hedges during the bird-nesting season (1st March until 31st August), except in certain legally defined circumstances, in accordance with the provisions of the Wildlife (Amendment) Act 2000.

**BI O20** Protect trees which are the subject of Tree Preservation Orders (see Table 12.3) and the 57 Champion and Heritage Trees in Kildare, which are identified on the Tree Register of Ireland.

Actions It is an action of the Council to:

**BI A11** Carry out a survey of trees within the main urban settlements as part of the preparation of Habitat Mapping for local area plans and to include policies for the protection of trees and hedgerows within local area plans where appropriate.

**BI A12** Identify and include additional trees and stands of trees on the TPO register that are deemed to be of particular significance during the life of the plan.

**BI A13** Encourage the awareness and engagement of the public in the identification and submission of trees for consideration for Tree Preservation Orders.

**BI A14** Develop, in conjunction with the Parks Department of Kildare County Council a Tree Strategy for the county which would include policies on tree pruning, tree removals, tree planting, tree preservation and the treatment of trees in relation to services and utilities.

**BI A15** Review the County Kildare Hedgerow Survey (2006), over the life of the Development Plan, as appropriate.

**BI A16** Develop a pilot project to demonstrate traditional hedgerow management skills including hedge laying.

## **Recommendations**

- Kildare County Council need to work with bodies such as the NPWS and National Biodiversity Data Centre to ensure that species for which Kildare is a national stronghold such as Green-Flowered Helleborine Orchid, the birds Yellowhammer and Linnet, which are nationally rare or declining, are supported to flourish. In particular study of the habitat requirements and behaviour of such species is required in a local context to ensure that habitat conditions favourable to such species are retained in Co. Kildare.
- I also recommend engagement with the National Forest Service on developing a suite of Neighbourhood exemplar projects with local communities throughout Kildare.
- Develop a map of areas of best quality hedgerows in the County, i.e. hedgerow hotspots and ensure ongoing conservation of these biodiverse areas.

**The spread of alien invasive plant and animal species** can have a significant economic impact as well as having an impact on biodiversity. The spread of invasive plant species such as Japanese Knotweed can result from activities associated with site preparation for development. The removal of vegetation on a site, or the drainage of a site, can allow the establishment of invasive species, as conditions become suited to these species. Spores or seeds or fragments of certain plant species can be transported between construction sites on plant and other equipment, or in soils, and can lead to establishment from invasive plants in new areas.

In relation to the threats to biodiversity as outlined above through the spread of invasive species I fully support the following Policy, Objectives and Actions of the proposed County Development Plan as outlined here below.

**BI P9** Support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds.

**Objectives** It is an objective of the Council to:

**BI O35** Require all development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan

where such species exist, in order to comply with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015.

**BI O36** Encourage, through Citizen Science, the public's awareness in the identification and eradication of invasive species and to provide training with respect to potential threats caused by invasive species, particularly their methods of dispersal and appropriate control and removal measures in association with relevant authorities.

Actions It is an action of the Council to:

**BI A17** Prepare a programme of mapping of invasive species in the county

### Recommendations

- I also recommend that the planting of certain species be banned from all proposed new development, i.e. all species listed as of concern by invasive species Ireland, including species such as cherry laurel ***Prunus laurocerasus*** and also species of a **potential invasive nature** as outlined by invasive species Ireland such as ***Cornus sericea L.***
- A management strategy for invasive Sika deer be developed as this species has a significant impact on re-forestation, re-wilding initiatives and woodland establishment as there is no natural predator for the species in Ireland.

**Cumulative Impacts.** While localised impacts on habitats or species caused by individual developments may not seem significant in their own right, they can often add up to a significant impact when considered cumulatively with similar impacts arising from other activities or developments affecting a particular site or species. Planning Authorities must have regard to cumulative impacts on protected sites and species when assessing individual planning applications for developments affecting these. Positive Impacts. New development can offer opportunities to create, restore or enhance habitats within a particular area or site. Development of new wetland features as part of Sustainable Urban Drainage Systems, new planting of native trees or hedgerows, and sensitive management of grassland habitats can all help to increase the biodiversity value of a site or area which is proposed for development, and to mitigate for potential losses elsewhere within a site.

### Recommendations

- I recommend that the Council highlight that all developments will be considered in the overall context of possible future development and in particular in the context of larger scale strategic developments which underpin future development in areas for example large sewage infrastructure, transport infrastructure and electric grid infrastructure. These projects while individual in nature can support a multitude of additional add on projects in an area and may need to be considered through higher level Strategic Environmental Assessment.

Thank you for taking time to consider my submission.

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**Documents Attached:** Níl