

## Submission to Kildare County Council as part of the Draft Development Plan Process

### Chapter 12 Biodiversity & Green Infrastructure

#### 1.0 Introduction

- 1.1 The Punchestown Area Community Group is a large group of residents who are passionate about the Punchestown area. The purpose of our group is to work for the benefit of the public and residents in the Punchestown area.
- 1.2 Our group formed to come together to address concerns of the local community and our aspirations for how our area can improve in the future in a balanced and inclusive manner. The key goal of the Punchestown Area Community Group is to help ensure that the Punchestown area becomes more inclusive, vibrant, economically robust and climate resilient.
- 1.3 Our group is passionate about preserving and respecting our incredible biodiversity. We are passionate about the protection of several rare, protected and threatened species that live in our area. We are extremely lucky to have maintained a high level of ecological value in our area and we are motivated to protect it and seek crucial protection by the development plan process for our valuable biodiversity.
- 1.4 Our community group consists of residents from Punchestown, Swordlestown, Mullacash and Flemingstown, all within a few kilometres of Punchestown racecourse.
- 1.5 The purpose of our submission is to **ask the Council to make an addition to the proposed Green Infrastructure Network by including the high ecological and diversity value country estate and demesne lands of Gowran Grange in Swordlestown as a 'stepping stone'**. For multiple reasons the Gowran Grange estate qualifies as an area of high biodiversity and merits inclusion in the Development Plan both on its own merits and because it provides significant linkages between other critical green infrastructure already presented in the Draft Plan. This is set out in more detail in the sections below.

#### 2.0 Punchestown area's biodiversity

- 2.1 We welcome the recognition by the Council in Chapter 12 of the Draft Plan of the importance of Kildare's biodiversity and green infrastructure. The green infrastructure present in Kildare is to be valued and prized and the Development Plan should make it a priority to identify, designate and protect areas of high biodiversity to ensure the protection of the existing green infrastructure network. We welcome Policy BI P12 of the Draft Plan which states that it is the policy of the Council to *"Recognise the importance of Green infrastructure in Kildare and protect this valued biological resource, the ecosystem it provides and the contribution to climate resilience."*

- 2.2 We also welcome the inclusion of policy objective BI O39 in the Draft Plan which states that it is the objective of the Council to *“Ensure the protection, enhancement and maintenance of Green Infrastructure in Kildare”*.
- 2.3 We also note and welcome the comments at 12.5.2 of the Draft Plan which sets out Regional Policy in relation to infrastructure. Specifically, it is stated as follows: *“The RSES strategy acknowledges the importance of identifying, protecting and enhancing Green Infrastructure as a core element of land use planning...”* We therefore consider these as 3 essential elements of the new Development Plan which requires the Council to firstly identify the important elements of the green infrastructure and subsequently protect and enhance them.
- 2.4 Our community group have reviewed Chapter 12 of the Draft Development Plan with a particular focus on the Punchestown area, of which the group are intimately familiar. From our knowledge of the area, we would suggest that there are some gaps in relation to very valuable existing green infrastructure which has not been mapped out and recorded in the Draft Plan. The purpose of this submission is to outline where we believe these gaps are and how they can be remedied at this stage by inclusion in the Development Plan. This will ensure the protection of a more robust green infrastructure network in Kildare. We set these out below.

### 3.0 Green Infrastructure Concept Map

- 3.1 Chapter 12 provides a map entitled ‘*Green Infrastructure Concept Map*’. This map sets out the main elements of the green infrastructure network in Kildare as follows:
- Core Areas
  - Stepping Stones
  - Green Corridors
  - Peatways
  - Blueways/Greenways
  - Designated areas (SACs, SPAs, pNHAs, NHA).
- 3.2 In order to specifically analyse the geographical area our community group is intimately familiar with, we have set out below at fig. 1 an extract from the Kildare Middle Green Infrastructure Map which focuses on the 5km radius around Naas town.
- 3.3 Naas is home to the second largest population in County Kildare and therefore it would be considered under urban pressure. This makes the green infrastructure immediately outside Naas of even more value and it should be afforded a high level of protection. This is recognised as a challenge in the adopted Naas local area plan. Within the Naas local area plan at 7.3.1.8 the Council recognises the *“dominant habitats within Naas are intensive agriculture and urban built land. For this reason, it is important to ensure that local biodiversity areas, which form an important part of the county’s Green Infrastructure and support connectivity within the network, are maintained, and are given the opportunity to increase their distribution within the town.”* We would argue

that this same focus and protection be extended to the 5km radius of Naas town, where there continues to be urban pressure.

3.4 Within a 5km radius, the key elements of the proposed green infrastructure are identified and set out at fig. 1 below. These are as follows:

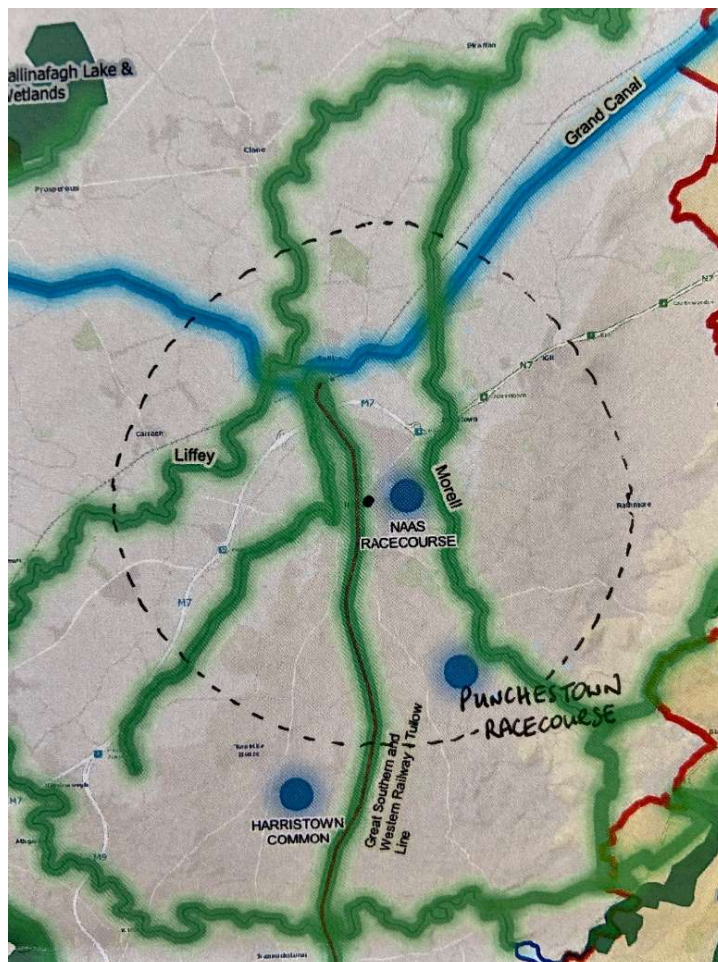
Green corridors: Tullow disused railway line, Corbally branch canal line

Greenways: Morrel river, Liffey river

Blueways: Grand canal

Stepping stones: Naas racecourse, Punchestown racecourse (although for some reason the label next to the Punchestown node is missing, which we presume to be an oversight).

**Fig. 1 – Extract from Green Infrastructure Map (Map Ref V1-12.3) focusing on a 5km radius around Naas town**



- 3.5 We welcome the inclusion of the designated green corridor along the old Sallins to Baltinglass (Tullow) railway line as shown in fig. 1 above and indicated by a blue arrow on fig. 2 below. We agree that this is a very valuable piece of green infrastructure. The rail line is bordered by hedgerows and treelines which include patches of woodland associated with historic parkland. It is likely that woodland along the railway line was planted during the original construction of the rail line in the 1800s. The Naas LAP at 7.3.1.9 recognises that “*protected species such as bat species, badger meles meles and red squirrel sciurus vulgaris are thought to use this area*”. In the experience of our group this is true and in fact bats, red squirrels and badgers traverse from this area into the wider Punchestown and Swordlestown area.
- 3.6 We also welcome the inclusion of the Corbally greenway as a designated green corridor as, like the Tullow railway line, it is rich in ecology and worthy of protection as a green corridor.
- 3.7 We note and welcome the inclusion of both Naas racecourse and Punchestown racecourse as important stepping stones in the green infrastructure plan and as shown in both figs. 1 and 2. Both racecourses represent large bodies of land in the 5km radius of Naas town and are truly crucial stepping stones for wildlife. Punchestown, in particular, is a large landholding in excess of 500 acres and is of high ecological value having been a racecourse operation since the 1820s. By virtue of its land use over the last 200 years the Punchestown landholding has grown to represent a site of high ecological value. In recent years the management team at Punchestown racecourse have sought to further improve the biodiversity of the site. In 2021 they commenced a project of rewilding certain areas and to create pollinator areas. They continue to champion sustainability in their approach to operating the racecourse and maintaining it is an important stepping stone in the green infrastructure network.
- 3.8 Our concern with the proposed green infrastructure concept map as set out at fig. 1 is that there are insufficient corridors connecting the proposed elements of the green infrastructure network within this 5km radius. We would respectfully suggest that the plan be further developed so that important pieces of green infrastructure are connected together and do not end in isolated places with no further linkages.
- 3.9 It is widely accepted that landscape connectivity is a key pillar for maintaining the ability for species to move in the landscape and for sustaining ecological processes and functioning. A decrease of connectivity can have negative impacts on ecosystem and amplify loss of biodiversity and ecosystem degradation. Equally, improving the connectivity between key pieces of infrastructure will have a positive impact on the ecosystem. For this reason, we would suggest that further linkages should be explored between the proposed green infrastructure elements in the Draft Plan.
- 3.10 It is widely acknowledged that a well-designed robust green infrastructure will consist of (i) core areas e.g. open and vegetated areas and (ii) corridors that physically connect core areas to one another.

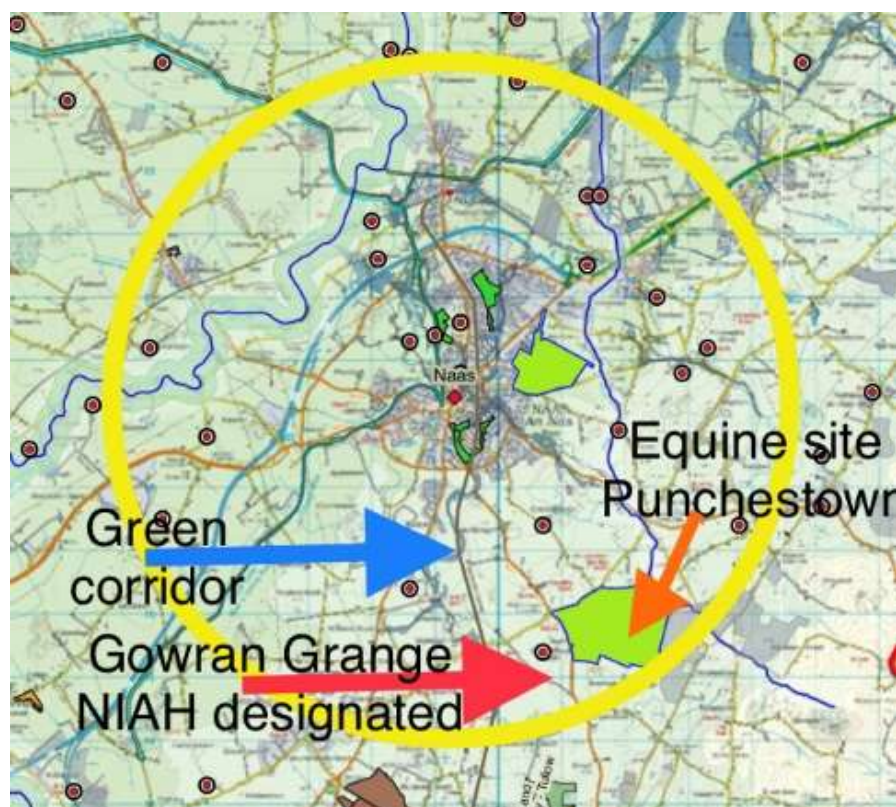


3.11 Best practice has established that when all the elements of a green infrastructure are connected to each other they achieve a complete and extremely high level of connectivity. For this reason, it is important to fully connect the green infrastructure to each other in order to provide true connectivity. In the context of the map at fig. 1 this would require a physical connection between the core areas **AND** the green corridors **AND** the stepping stones. It is therefore necessary for Kildare County Council to identify how these areas can be physically connected with existing infrastructure in order to ensure a robust network. Critical areas should be connected to the overall network in order to maximise their contribution and ensure their ongoing ecological benefits.

3.12 In addition to suggesting further linkages, our community group has identified one critical area which should be added into the green infrastructure network and which is within the 5km radius as shown in fig. 2. This critical area is the **NIAH Designated Garden and Parkland Estate of Gowran Grange in Swordlestown** (south of Naas). The Gowran Grange estate sits immediately between the proposed 'stepping stone' of Punchestown racecourse and the proposed 'green corridor' of the Tullow railway line. In fact the green corridor of the Tullow railway line actually forms part of the Gowran Grange estate and therefore it is accurate to say that already part of the landholding of the Gowran Grange Estate has been identified as a critical part of the green infrastructure network. We would contend however that the entire Gowran Grange estate merits inclusion for multiple reasons as set out below.

3.13 The exact location of Gowran Grange is shown marked with a red arrow at fig. 2.

**Fig. 2 – Extract from 'Green Infrastructure Kildare Middle' Map (Map Ref V1-12.5).**



- 3.14 The yellow circle in fig. 2 highlights a radius of 5km from the centre of Naas to the surrounding area, which includes Punchestown racecourse to the south of Naas town.
- 3.15 The map at fig. 2 is an extract from the proposed Development Plan. For ease of reference the Gowran Grange estate can clearly be seen on the map.
- 3.16 The map provided at fig. 2 also shows the locations of properties that are on the NIAH register (which is the Survey of Historical Gardens and Designed Landscapes).
- 3.17 The Gowran Grange estate is marked clearly at fig. 2 by a red circle/dot as this estate has already been recognised as being of important heritage value. Gowran Grange along with many other historic country houses and their landholdings are significant in size and merit inclusion of their entire landholding as many of them represent important green infrastructure stepping stones. Their designated parklands often include specimen trees, developed mature woodland and established old hedgerows of enormous ecological value. For these reasons they should be designated as 'stepping stones' on the green infrastructure network.
- 3.18 Surprisingly the written text of Chapter 12 makes no specific reference to properties and estates on the NIAH register which we assume is an oversight. This should be corrected as part of the Development Plan process. We would respectfully suggest that properties on the NIAH register should be designated as 'stepping stones' on the Green Infrastructure network generally.
- 3.19 As stated above, the written statement of Chapter 12 should specifically refer to these NIAH designated gardens as designated stepping stones in the green infrastructure plan otherwise their importance will not be fully understood and subsequently their importance will be overlooked.
- 3.20 Our community group includes many established farmers and equine stud farmers and therefore the group has a deep understanding of the rich biodiversity of the Punchestown area and its environs. Our group has a deep knowledge of the important pieces of green infrastructure present in our geographical area and believe that the omission of the Gowran Grange estate and demesne in the green infrastructure network must be remedied. It is our recommendation that the Gowran Grange estate be added to the green infrastructure network both in policy terms and included on the concept map and detailed map of Kildare Middle.
- 3.21 It is perhaps useful at this stage to explain why the Gowran Grange qualifies as such an important stepping stone in the green infrastructure network. Stepping stones are essential for the migration, dispersal and exchange of wild animals. When they are adjacent to ecological corridors this allows high levels of movement for wildlife. The Draft Development Plan defines a stepping stone at 12.14.5 of the Plan as follows: *"These are smaller geographical areas but either critically important because of their environmental quality (i.e. local native woodlands, intact bogs/peatlands, wetlands), local amenity value or because of their scale as undeveloped areas..."*

#### 4.0 About the Gowran Grange estate & Demesne

3.22 The Gowran Grange estate comprises a very large country house and demesne situated in the Swordlestown area, immediately adjacent to Punchestown racecourse. It is a large estate of approximately 370 acres.

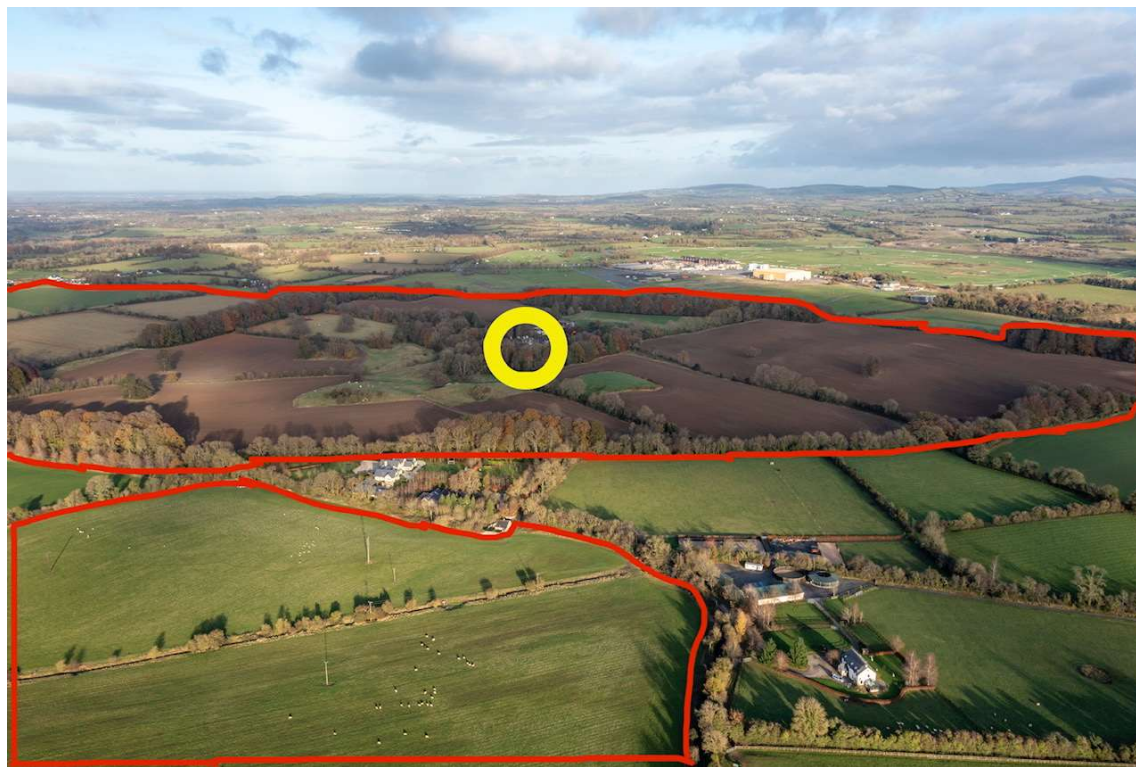
3.23 Its location is shown at fig. 3 below edged in yellow.

***Fig. 3 – Location of the Gowran Grange country house & Demesne, immediately west of Punchestown racecourse***





**Fig. 4 – Aerial photo of the Gowran Grange country house & Demesne. The estate lands are edged in red and the location of the country house is highlighted with a yellow circle**



3.24 The Gowran Grange estate sits immediately adjacent and to the west of Punchestown racecourse (divided by the Ballymore Eustace Road). The Woolpack Road (L2023) runs through the Gowran Grange estate at the northerly part (between the central parcel and the northern parcel of the land holding). The estate extends westwards and incorporates part of the disused Dunlavin railway line.

3.25 The Gowran Grange estate with its 370 acres of land has been in control by the same family for approximately 250 years. The landholding was developed into a parkland estate in the 1850s when the country house was built by renowned architect John McCurdy. At the same time a substantial amount of woodland of approximately **48 acres** was planted out throughout as follows:

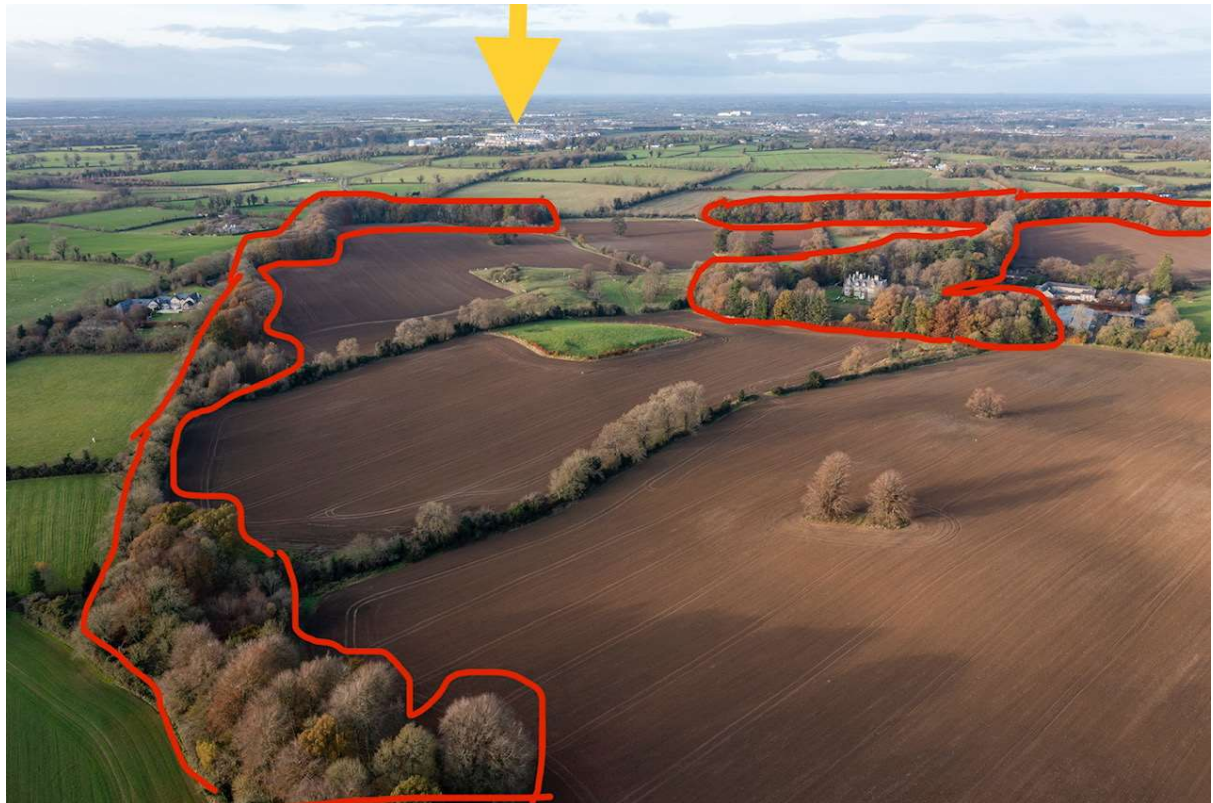
- A substantial amount was planted around the perimeter of the central part of the estate and
  - A substantial amount of woodland was planted around the main country house and up the main entrance driveway to the manor house and
  - A woodland forest known as the Foxes Covert was planted adjacent to the Northern Parcel. The breakdown of the established woodland is as follows:
- |  |            |
|--|------------|
| • Perimeter woodland planting:         | 31.4 acres |
| • Central planting around manor house: | 9.3 acres  |
| • Foxes covert woodland forest:        | 7.3 acres  |

**Total: 48 acres**



3.26 These established woodlands remain today and are of very high ecological value and great beauty. An aerial photo of the Gowran Grange estate is provided at fig. 5. The red lined area indicates some of the existing woodlands areas within the estate. The yellow area on the image shows the location of Piper's Hill, in order to give some scale of reference.

**Fig. 5 – Aerial image of important woodland present within the Gowran Grange estate**



3.27 The Foxes covert woodland forest is within the Gowran Grange estate. The Foxes Covert is of unique importance in that it represents a significantly large area in size (in relation to its surrounding area). The Foxes Covert is located only 200m from important hedgerow as identified in the Green Infrastructure Plan as presented as part of the Draft Naas Area Plan Review. A map is provided at fig. 6 below.

3.28 An area marked as '9' in fig. 6 shows the location of Killashee. The green arrow indicates the location of the 7.3 acre forest known as the Foxes Covert. The forest is located only 200m from the Killashee estate and only 200m from the hedgerow as identified as part of the Naas Area Plan as being "important green infrastructure". It is therefore logical and prudent that the Foxes Covert should be connected into the green corridor as identified in the Draft Development Plan as it clearly represents a significantly forested area in its vicinity and is of high ecological value.

**Fig. 6 – Map showing the location of the Foxes Covert Forest**



3.29 An aerial photograph is provided at fig. 7 showing the location of the Foxes Covert forest by a red arrow. A yellow arrow at fig. 7 indicates the location of the Piper's Hill housing development. It is clear that the Foxes Covert is an established forest of high ecological value, having been in existence since at least the first OSI map in 1837.



**Fig. 7– Aerial image showing the location of the 7.3 acre forest known as the Foxes Covert. The yellow arrow indicates the location of the Piper’s Hill housing estate. Nearby Naas is shown in the distance**



3.30 In addition to the established woodlands, the Gowran Grange estate comprises approximately 15km of established hedgerows. These hedgerows are of very high ecological value. Photographs from OSI maps in 1837 show that these hedgerows have remained almost totally unchanged since this time. It is widely acknowledged that old hedgerows are of even higher ecological value compared to their newer counterparts. The Draft Development Plan at 12.9.1 recognises the important of hedgerows as follows: *“County Kildare’s hedgerow network is a huge asset to the county, being valuable in terms of agriculture, landscape, wild flora and fauna, water quality, carbon sequestration and employment..... Older hedges made up of native trees and shrubs, tend to have greater value in wildlife and heritage terms, having larger banks and ditches and being richer in species diversity.”* This is certainly true of the hedgerows within the Gowran Grange estate.

3.31 The Draft Development Plan also recognises the importance of the woodlands present within the estate. At 12.9.1 it is stated that *“trees, woodlands and hedgerows perform many functions such as shelter from wind, act as a natural barrier, absorb pollutants and provide a biodiversity function in terms of provision of habitat and food sources and are important producers of oxygen and act as carbon sinks.”*

- 3.32 When the Gowran Grange was designed as a parkland estate in the 1850s, a number of water features were added which are of high ecological value. These include ponds which are home to a large frog population and other amphibians.
- 3.33 The Gowran Grange estate is also traversed by two important streams which feed into the Lakes at Naas via Swordlestown and Broadfield. Otters and crayfish have been identified in these streams. The freshwater crayfish is a protected Annex 1 species and a healthy population has been recorded in the Swordlestown stream. This is of vital importance as an EPA Report in 2020 found that 85% of EU protected habitats have an unfavourable status. Furthermore, at 12.2 of the Draft Development Plan it is stated as follows: *"The picture for EU protected species is mixed, 15% are in decline, with freshwater species most at risk"*. The freshwater crayfish population within the Swordlestown stream and present within the Gowran Grange estate is to be valued and protected all the more.
- 3.34 The Gowran Grange estate is widely known to play host to a very wide and diverse wildlife and birdlife population.
- 3.35 In February 2022 the Punchestown Area Community Group appointed a professional ecologist (Dr Mary O'Connor) to undertake an analysis of the ecology in the Punchestown area, with a particular focus on the Gowran Grange estate. Dr O'Connor was appointed as she has 25 year's experience in preparing ecological reports for a variety of reasons.
- 3.36 Dr Mary O'Connor's full ecology report is available to the council if they so require it, but the main findings of the report are worth setting out: **The ecologist found that the Gowran Grange estate was of very high ecological value and represents a significant site for biodiversity both in terms of birds, wildlife and habitats present.**
- 3.37 Many birds that are listed as being of 'high' or 'medium' conservation concern by Birdwatch Ireland are present on the Gowran Grange estate. These include 'Red and Amber List birds' which are birds that are listed as being of high or medium conservation concern as listed by Birdwatch Ireland.
- 3.38 Gowran Grange is located in the Swordlestown area which sits immediately adjacent to the other following areas: Punchestown, Mullacash, Flemingstown. The various figures below sets out the various species that are present or have been present recently in the Punchestown area and its environs.
- 3.39 The following red listed bird species have all been recorded as recently active at the Gowran Grange estate or within very close proximity to Gowran Grange.



**Fig. 8 – Red list species recorded at Gowran Grange and its environs**

Bird type	Status	Recorded locations
Swift	Red list status	Swordlestown & Mullacash
Woodcock	Red list status	Swordlestown & Mullacash
Barn owl	Red list status	Swordlestown & Mullacash
Red Kite	Red list status	Mullacash & Eadestown
Kestrel	Red list status	Swordlestown & Mullacash
Yellowhammer	Red list status	Swordlestown
Redwing	Red list status	Punchestown
Lapwing	Red list status	Punchestown
Golden Plover	Red list status	Punchestown Mullacash
Snipe	Red list status	Punchestown, Mullacash, Flemingstown North

**Fig. 9 – Amber list species recorded at Gowran Grange and its environs**

Bird type	Status	Recorded locations
House martin	Amber list status	Swordlestown, Mullacash
Kingfisher	Amber list status	Swordlestown
Skylark	Amber list status	Punchestown
Swallow	Amber list status	Swordlestown, Punchestown, Mullacash, Flemingstown North
Starling	Amber list status	Punchestown, Mullacash
Goldcrest	Amber list status	Punchestown
House sparrow	Amber list status	Swordlestown & Mullacash
Tree sparrow	Amber list status	Swordlestown, Eadestown
Greenfinch	Amber list status	Swordlestown & Mullacash Eadestown
Linnet	Amber list status	Swordlestown & Mullacash Eadestown
Western yellow wagtail	Amber list status	Swordlestown
Greylag goose	Amber list status	
Mute swan	Amber list status	Punchestown, Mullacash
Whooper Swan	Amber list status	Mullacash
Tufted Duck	Amber list status	Punchestown, Mullacash
Wigeon	Amber list status	Mullacash, Flemingstown S
Mallard	Amber list status	Mullacash, Flemingstown
Teal	Amber list status	Mullacash, Flemingstown S
Black-headed gull	Amber list status	Mullacash, Flemingstown N
Lesser Black backed gull	Amber list status	Mullacash

3.40 It is worth particularly mentioning the lesser black-backed gull who is a regular user of the Punchestown area and specifically within 2km of Gowran Grange. This bird is of high importance in that it is a conservation objective species of the nearby Poulaphouca Reservoir SPA. The lesser black-backed gull was recorded as being in the Mullacash area as recently as this year by the local Ballymore Eustace Gun Club. It is clear that the lesser black backed gull uses this area for feeding.

3.41 In addition to the important bird species highlighted above, there are many important mammal species recorded at Gowran Grange and in the Punchestown area as set out in fig. 10. These were identified and confirmed in the ecologists report and are set out below.

**Fig. 10 - Mammals recorded at Gowran Grange and within its environs**

Mammal type	Recorded locations
Hedgehog	Mullacash, Flemingstown North
Pygmy shrew	Swordlestown
Common pipistrelle	Swordlestown
Soprano pipistrelle	Swordlestown, Flemingstown North
Irish Hare	Swordlestown, Mullacash
Red squirrel	Punchestown
Otter	Swordlestown N, Punchestown, Mullacash
Stoat	Mullacash, Swordlestown
Badger	Mullacash, Flemingstown North, Swordlestown G. Lane, Swordlestown N
Pine Marten	Mullacash, Swordlestown
Sika deer	Swordlestown, Mullacash, Flemingstown N
Wood Mouse	Swordlestown, Mullacash
Hazel dormouse	Swordlestown

**Fig. 11 - Amphibians recorded at Gowran Grange and within its environs**

Amphibians	Recorded locations
Common frog	Swordlestown, Flemingstown N, Mullacash
Smooth newt	Swordlestown

**Fig. 12 - Invertebrates recorded at Gowran Grange and within its environs**

Invertebrates	Status	Recorded locations
White Clawed Crayfish	Annex II Species under Habitats Directive	Swordlestown Stream Broadfield Stream

3.42 In relation to the pine marten referenced in fig. 10 above, as recently as 6 weeks ago a pine marten was spotted in the Foxes Covert which is the 7.3-acre forest which is within the Gowran Grange estate. Video footage of the pine marten is available to the Council. The following is stated on the website of the NPWS: *“The pine marten is native to Ireland and is one of our rarest mammals. Once common throughout the country, by the 20th century this species had become extinct from the majority of the island, surviving only in a few isolated and fragmented populations, mainly in the west.”* We are very lucky to have an active pine marten population in the Swordlestown and Mullacash area today and this is worthy of protection.

3.43 It is clear from the Dr O’Connor’s ecology report that the Gowran Grange estate is of high ecological value. The estate is home to a significant number of red listed and

amber listed bird species and protected mammal types. The estate has been in the same family for almost 300 years and during this time has developed into a very high value site for biodiversity.

- 3.44 The Gowran Grange estate clearly represents an important and key piece of the green infrastructure in the overall network and should be recognised for its contribution. Unless the estate is acknowledged as an important piece of green infrastructure then it will fail to be protected and may suffer significant habitat degradation in the years ahead.
- 3.45 From the evidence available it is clear that the Gowran Grange estate is an important ecological location and it warrants inclusion as an important stepping stone on the Green Infrastructure Map as set out below.

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*Recommendation: Add the Gowran Grange estate and demesne lands to the Green Infrastructure network as a 'Stepping Stone'.*

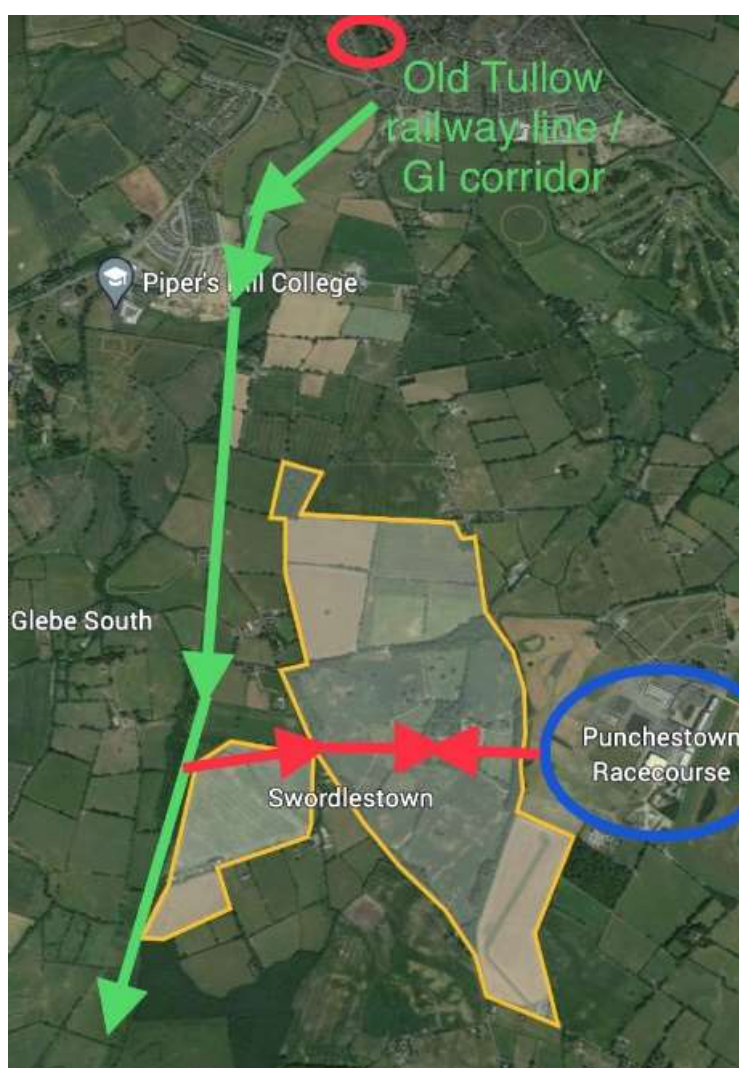
*\*The appropriate place in the Development Plan document for the inclusion of Gowran Grange is at 12.14.7 of the Draft Plan.*

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- 1.1 At 12.14.7 of the Draft Plan there is a list of the proposed stepping stones that are included on the green infrastructure network. The Draft Development Plan defines a stepping stone at 12.14.5 of the Plan as follows: *"These are smaller geographical areas but either critically important because of their environmental quality (i.e. local native woodlands, intact bogs/peatlands, wetlands) , local amenity value or because of their scale as undeveloped areas..."*
- 1.2 At 12.14.7 the list of stepping stones includes all native and mixed woodlands such as those in State/Coillte ownership. There is no justification of why an overall woodland area of 48 acres within the Gowran Grange estate which is within the 5km radius of Naas should not have been included as a stepping stone.
- 1.3 There is a further reason for the justification of the inclusion of the Gowran Grange estate as a key stepping stone. As set out earlier in this report, it is acknowledged that stepping stones are essential for the migration, dispersal and exchange of wild animals. When they are adjacent to ecological corridors this allows high levels of movement for wildlife.
- 1.4 The Gowran Grange estate is immediately adjacent to both a green corridor **AND** a stepping stone. Specifically part of the Gowran Grange estate is already designated as a

green corridor as the Tullow railway line runs through the Gowran Grange estate. Its connections from the entire 32km green corridor through the estate to the designated stepping stone of Punchestown racecourse is very important. This high level of connectivity is clearly illustrated on the map provided at fig. 13. The red arrows indicate the ongoing high level of connectivity that would be provided between the green corridor and Punchestown racecourse **if the Gowran Grange would be designated as a stepping stone**. Without this designation then the Gowran Grange estate is at risk of habitat degradation over time.

**Fig. 13 – Map showing the key location of Gowran Grange as a connection between the proposed green corridor (Tullow Railway line) and the proposed stepping stone (Punchestown racecourse)**



- 1.5 Given what we know about the high value of ecology at the Gowran Grange estate (as set out above and as confirmed by expert ecologists in recent months) it is clear that the Gowran Grange estate is a key piece of green infrastructure. Failure to specifically designate it as such would represent a failure to protect the biodiversity hotspot that the Gowran Grange estate represents and this would be a failure under EU obligations to protect and manage Europe's valuable biodiversity. It would also be a failure of



Kildare's responsibilities under the Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031 whereon it is stated at 12.5.2 of the draft plan as follows: *"The strategy acknowledges the importance of identifying, protecting and enhancing Green Infrastructure as a core element of land use planning"*. It is clear that the Gowran Grange represents key infrastructure and should be protected accordingly, such protection being afforded by designating the Gowran Grange estate and demesne as a stepping stone on the green infrastructure network.

- 1.6 Article 10 of the EU Habitats Directive states that Member States shall endeavour in their land use planning and development policies to encourage the management of features of the landscape. This is further explained in 12.7 of the Draft Development Plan which states that *"such features are those which by virtue of their linear and continuous structures such as rivers and riverbanks or hedgerows or by virtue of their functions as 'stepping-stones' such as ponds or small woods are essential for the migration, dispersal exchange of wild species."* It is clear that the Gowran Grange estate is able to support such a large amount of wildlife and birdlife at present due to the fact that it is operating as a de facto stepping-stone already. The streams within it support valuable protected species and the 48 acres of forest and 15km of hedgerow provide a dense and rich environment for wildlife to freely move and birdlife to peacefully survive and thrive. In the spirit of Article 10 of the EU Habitats Directive the Gowran Grange estate is clearly of high ecological value and warrants inclusion on the Green Infrastructure Network as a Stepping Stone.
- 1.7 Chapter 12 of the Draft Plan states on its first page that the aim of the Council is to *"promote the development of an integrated Green Infrastructure network"*. It is clear that in order for the network to be fully *"integrated"* that the Gowran Grange estate must be added into it. In addition, we understand that Kildare County Council declared a Climate Change and Biodiversity Loss Emergency in June 2019, as referenced as at 12.2 of the Draft Plan. It is therefore more important than ever to protect the biodiversity that we know that we have and that is evidence based. Now that we know of the important biodiversity of the Gowran Grange estate then it is incumbent upon us to protect it by its inclusion in the Development Plan as a designated stepping stone in the Green Infrastructure Network.
- 1.8 We respectfully ask the Council to accept our recommendation and to designate Gowran Grange as a stepping stone on the Green Infrastructure Network.

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*Recommendation: Add the Gowran Grange estate and demesne lands to the Green Infrastructure network as a 'Stepping Stone'.*

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