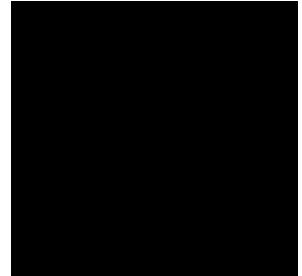


Evelyn Cullen



The Draft Kildare County Development Plan,
C/O The Administrative Officer,
Forward Planning,
Áras Chill Dara, Devoy Park,
Naas, Co. Kildare

Kildare County Development Plan 2023 – 2029

Dear Sir/Madam,

9.5 Equine

I refer to the council's policy - RD P3 '*Support equine related activities of an appropriate size at suitable locations in the county*' & RD P4 '*Support and encourage the continued development of a distinguished bloodstock industry in Kildare*'.

As the owner of Middlelane Farm, I welcome this inclusion. This area is known worldwide for horse breeding and racing at Punchestown and is home to several Stud Farms including my own. Our main source of income is from breeding racehorses and selling them as foals therefore we require the ongoing support of the bloodstock industry in Kildare. We respectfully request the Council to consider adding a new policy in order to ensure sufficient protection to the industry as follows: "**It is the policy of the Council to encourage the expansion of the bloodstock industry by protecting the equine environment in order to provide a calm, quiet and hazard free environment for the breeding of horses**". Without a policy objective such as this then our viability to continue operating as a stud farm in Kildare is very compromised.

We have spent 50 years breeding horses at our stud farm locally and more than ever we require the Council to continue to ensure that we enjoy a calm, quiet and hazard free environment. Without an environment of this kind then we cannot continue to operate safely and will have no choice but to close all operations. The Council will be aware that mares and foals and young stock require a peaceful environment in which to develop and noise from traffic and significant

construction is detrimental to that. The Council have previously acknowledged the concept of “incompatible development” with equine operations however this has not been defined: in our experience incompatible development is *any* development which produces significant noise which interferes with the breeding and foaling operations which we undertake.

The Council will be aware that the stud farm industry in Kildare is under threat. For example, the 1999 Kildare Development Plan states that at this time there were 162 stud farms in County Kildare. By the 2005 Development Plan this had already reduced to 153 stud farms. The County Development Plan in 2011 recorded a further drop to 145 stud farms. Most recently the 2017 County Development Plan for Kildare recorded only 104 stud farms remaining in County Kildare. **This means that since 1999 more than 1 in 3 stud farms in Kildare have closed their operations.** This is a significant issue and is evidence of the ongoing threat to the stud farm industry. We therefore ask the Council to provide additional protection to breeding operations by inclusion of the following policy objective: “***It is the policy of the Council to encourage the expansion of the bloodstock industry by protecting the equine environment in order to provide a calm, quiet and hazard free environment for the breeding of horses***”.

Additionally, I hereby request the Council to consider adding an additional policy objective to support Sports Horse Breeding. Kildare has a number of breeders, producers, professional riders /owners and event centres and has the capacity to expand and add sustainability and add value in the coming years. At 9.5 of the Draft Development Plan it is stated as follows: “Kildare has a world-renowned reputation for breeding”. I would agree that this is true, however surprisingly there is no policy objective to specifically support breeding of horses. I would ask for a new policy objective to be specifically added which deals with this as follows: “***It is the policy of the Council to support sports horse breeding and thoroughbred breeding operations in Kildare.***” (Objective RD 017 mentions breeding but only in the context of the racecourses.)

9.4.1 Agri Food Sector

I refer to the council’s policy in the Draft Development Plan at RD P2 to ‘*support the future and continued development of agriculture and the agri-food sector in County Kildare*’.

It is essential more than ever to ensure protection of the agriculture and the agri food sector in Kildare as this underpins our food security into the future.

A recent article in the Farming Independent (08/03/2022) stated that only 23% of Irelands’ land is suitable for tillage. We need to protect this prime agricultural land from inappropriate development that would further reduce that percentage, for example, a reallocation of prime agriculture land for solar energy use where food production is no longer the main activity. An Foras Taluntas (Teagasc predecessor) National survey have undertaken extensive studies of the soil in County Kildare. It is therefore clear which lands are identified as rich and valuable land types (specifically Elton and Dunstown series). These soil types contribute significantly to high yielding crops and top quality grass attracting the many horse breeders to the area and making this a particularly attractive area for farming. These soil types should be reserved for food production as this is their best and most productive use.

Therefore, I would ask that a specific policy regarding preservation of prime agricultural land for food production be included in the 2023-2029 plan as follows: “***It is the policy of the Council to ensure the preservation of prime agricultural land for food production.***”

12.11 Wetlands

I refer to the council's policy on wetlands.

My stud farm incorporates a designated wetland area and is adjacent to a number of additional wetlands, all of which were identified in the 2012-2014 Wetlands Survey for Kildare.

On a daily basis I witness the variety of birds that the wetlands attract including mallard, pheasant, beward, heron, sparrowhook, moore hen, kestrel, piegeon, snipe, doves, owls, thrush, kingfisher, tits, goldcrest, sparrows, warbler, chiff chaff and red wing.

I also regularly witness many mammals who have their home in the local wetlands as follows: foxes, badgers, hedgehog, otter, pine marten, rabbits, hare and bats.

Additionally, there are a number of butterflies regularly seen in the local wetlands including red admiral, marsh fritillary, orange tip, speckled wood, small copper and meadow brown.

I am passionate about conservation work and I am actively pursuing a goal of returning my wetland (Flemington South) to a curlew breeding ground. It was classified in the 2012-2014 Wetlands Survey as being of Local Conservation Value (moderate value) and assigned a rating of D.

I welcome Policy Objective BI PI which states "*It is the policy of the Council to ensure that Kildares 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.*"

Whilst I welcome the above policy objective I am disappointed to see this is qualified and restricted in Policy Objective BI O31 which seeks to *only* protect wetlands that have been rated A, B, C+ and C. I cannot see any rationale for not providing protection to wetlands that have been rated D and E, of which there are 108 (representing 47% of all of Kildare's wetlands). I consider this a significant omission in the Draft Development Plan and hereby request the Council to extend the protection to wetlands to include ALL 231 wetlands that were identified in the 2012-2014 Wetland Survey. It is clear that in a time of acute Biodiversity Crisis that every wetland is of importance in halting biodiversity loss therefore it is a prudent measure to provide protection in the County Development Plan to all wetlands.

As stated above, the wetland on my own farm was classified in 2012-2014 as category D of local conservation value. As it currently stands the Draft Development Plan does not specifically afford it protection. This is a significant oversight. In a personal capacity I continue to take measures to improve the quality of these local wetlands. I therefore urge the Council to provide to all wetlands, including those in my area. An image is provided below which is an extract from the map of Irish Wetlands. The area shown on the map is the rural area immediately south of Naas town. The town of Naas has undergone significant growth in recent years and is a major town in the County. It is extremely lucky to have a network of wetlands immediately to the south of the town which provide flood protection and a host of other biodiversity benefits. Every single one of these wetlands is worthy of protection and I ask the council to **expand the protection of wetlands to include all wetlands identified in the 2012-2014 Wetland Survey.**



11.15 Protected Structures

I refer to the council's policy on protected structures.

I live close to the historical demesne estate of Gowran Grange and I am very familiar with it. The estate was established in the 1850s by the construction of an extensive Country House for the de Robeck family, designed by the renowned architects Lanyon and Lynn and assisted by John McCurdy. Their architectural designs have been afforded legal protection throughout Ireland in recognition of their exceptional work.

The manor house was also complemented by extensive tree planting and a parkland estate including water features, ponds, stone walls throughout and specimen planting. **The Gowran Grange is a very special demesne estate that deserves protection by adding it to the Record of Protected Structures.**

It is also a very valuable large country estate in terms of its biodiversity value. It is home to many protected species and habitats. **The Gowran Grange estate warrants inclusion as an area of high biodiversity value and inclusion on the Green Infrastructure Network as set out in Chapter 12.**

Yours sincerely

Evelyn Cullen