Wicklow County Council
Via email: planreview@wicklowcoco.ie

December 20th 2019

**RE: Public Consultation on Wicklow CoCo Development Plan 2021-2027-Phase 1**

To Whom It May Concern:

BirdWatch Ireland submits the following points in relation to the next Development Plan for Co. Wicklow. BirdWatch Ireland is Ireland's largest conservation organisation. Our mission is the conservation of birds, their habitats and other biodiversity in Ireland. In 2019 we celebrated our 50th anniversary and for most of this time our Headquarters has been based in Co. Wicklow. In addition one of our most visited reserves is in Wicklow-the East Coast Nature Reserve. So not only are we making a submission focusing on addressing concerns in relation to biodiversity and climate change in the context of Co. Wicklow, we will make points as an employer in the area where many of our employees live and work.

**1.0 Overarching Messages**

Our overarching message for the next County Development Plan for Wicklow is that significant efforts must be made to address the Wicklow County Council declared (May 2nd 2019), Dáil declared (May 9th 2019) and European Union Parliament declared (November 29th 2019) biodiversity and climate emergencies. We are running out of time to address both. In order for the world to stay below 1.5 degrees of warming, emissions must be halved by 2030 yet Ireland's ambition is falling far short of this. Ireland is also failing to halt biodiversity loss and we will not meet our 2020 targets. Wicklow County Council led in its declaration of the biodiversity and climate emergency and now it has the opportunity to lead again in its ambition on both.

The National Planning Framework and the next layer of Regional and Economic Strategies are not in line with meeting our climate and biodiversity goals[1]. The Wicklow Co Development Plan will follow the policies and strategies laid out in these plans and strategies but we urge caution that the Council should aim higher and seek to be a leader in the country in its policies and objectives in the next development plan and subsequent plans. The following overarching issues should be addressed within the next County Development Plan:

- Climate mitigation to achieve the level of emissions reduction action required at county level.
- Climate adaptation actions to address projected increased sea level rise, storm surge, flooding and animal fodder impact which the County will face with global temperature average increase reaching 1.5 degrees.
- Applying UN Sustainable Development Goals (SDGs) at county level.
- Enhancing local food security enablers as well as low carbon and local food production networks to address the fact that 80% of Irish people buy food which is imported.

[1] Environmental Pillar submission on the National Planning Framework (2017)
https://www.antaisce.org/sites/antaisce.org/files/20171011-npf.pdf

- Achieving health and wellbeing standards with regard to access to clean air and water, services and recreation.
- Reducing resource consumption and waste generation advancing Circular Economy principles.
- Addressing the level of habitats and species with "Bad" or "Unfavourable "status as evaluated under the Habitats Directive.
- Ensuring that the conservation efforts are directed to the bird species that are of conservation concern (those Red and Amber listed on the BirdWatch Ireland Birds of Conservation Concern List (will be revised in 2020) and species listed on Annex 1 of the Birds Directive.
- Ocean/sea acidification, ocean/sea plastic dispersal, and meeting marine ecosystem protection obligations of Marine Strategy Framework Directive.
- Meeting EU Directives and other obligations on air, water quality, waste, nitrates and other chemicals.
- Addressing unsustainable settlement and transport generation patterns.
- Meeting objectives of Council of Europe Conventions on landscape, archaeology and architectural heritage.
- Enhancing general quality of life standards, such as reduction in commuting time and access to parks, recreational and sporting facilities.
- Giving consideration to all, including wellbeing of children and an aging population

**1.1 Climate Change**

BirdWatch Ireland supports all efforts to ensure fast and deep cuts to greenhouse gas emissions so that Ireland can at least halve emissions by 2030. The reality is 2020 marks the beginning of a decade in which global emissions must reduce by 55% before 2030 if the 1.5ºC limit in the Paris Agreement is to remain at all feasible. In 2019 the Joint Oireachtas Committee on Climate Action endorsed a target of net zero by 2050 and the enshrinement of this target into law in Quarter 1 of 2020.

A rapid and deep, fair and transformative transition to a decarbonised global economy is now required over the next decade to prevent the spiralling of catastrophic climate impacts, and to reduce the levels of risks associated with the transition to a zero carbon future[2].

Ireland will fail considerably on its 2020 climate and energy targets[3]. Under the EU's Effort Sharing Decision, Ireland continues to exceed its binding allocated emissions budget. Ireland had pledged to reduce emissions to 20% below 2005 levels by 2020. Ireland may reduce emissions by only 1% on 2005 levels by 2020.

For 2018, Ireland exceeded its annual emissions allocation by over 5 million tonnes. This follows an exceedance of 3 million tonnes in 2017. A marginal decrease in domestic emissions (of 2%) in 2018 was attributed to the ESB's coal-powered Moneypoint station being out of action for several months last year, rather than the outcome of any specific climate policy intervention. Any subsequent gains were offset by growth in emissions from households, transport, and agriculture.

Ireland is far off track to meeting its current 2030 target and longer term commitments to decarbonise the economy. The most recent projections show that over the next decade, even with additional policy measures included in the National Development Plan, methane and nitrous oxide emissions from the agri-food sector are projected to increase by 3%. Continued growth in emissions from the transport sector is also projected in the short term, largely due to fuel consumption from diesel cars and diesel

[2] The Intergovernmental Panel on Climate Change (IPCC), 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas.

[3] https://www.epa.ie/newsandevents/news/pressreleases2019/name,66063,en.html

freight. Because of the delay in getting off fossil fuels, coal, peat and, increasingly, natural gas will continue to be key contributors to emissions from the power generation sector. Energy consumption is also expected to grow, going in the opposite direction of what is needed collectively by the EU[4].

These trends are unacceptable. Climate action requires that $CO_2$ emissions from energy and cement need to go to net zero well before 2050; nitrous oxide and especially methane emissions need to reduce steadily and permanently, therefore increases in these emissions from agriculture cannot be permitted. ▪ Ireland faces annual financial penalties in the region of €500 million per annum after 2020 for failing to comply with our EU climate and renewable energy commitments. Noncompliance could cost Ireland between €3bn and €6bn by 2030.

The 2019 Climate Action Plan sets a pathway for a 2% decline in emissions per annum from 2021 to 2030 to meet our EU targets. Such a shallow pathway was never in line with Ireland's fair share of a Paris Agreement carbon budget. Ireland has a very limited remaining Paris-aligned carbon budget[5], and will need to reduce emissions by more than 7% per annum every year in order to achieve net zero emissions by mid-century at the latest.

In addition, steady and permanent reductions in methane emissions (primarily from agriculture) of about 2% to 3% per year will be essential to achieving net zero and limiting warming-equivalent overshoot of a Paris-aligned cumulative emissions budget[6].

At the UNFCCC COP 25 in Madrid in December 2019, Minister for Communications, Climate Action and the Environment, Richard Bruton stated that Ireland will join the Carbon Neutrality Coalition – a Coalition of countries committed to achieving net zero emissions by 2050. However, it needs to be emphasised that achieving net zero by 2050 is not the same as limiting warming to 1.5°C. Delivering on the 1.5°C limit demands steep, permanent near-term cuts in emissions, frontloading action over the next decade rather than hoping for technological miracles after 2030.

Ireland's continuing delay in increasing action and ambition will drastically escalate the governmental and political effort that will be required in the future, with an overall 5 Cain (2019) showing methane warming reduction: https://www.nature.com/articles/s41612-019-0086-4 5 negative impact on society, biodiversity, and the economy.

**The emissions reductions now required need to be achieved equitably and will be difficult, but every year of insufficient action only increases the required decarbonisation rate.**

With the EU now set to increase its 2030 target over the coming year to at least 55%, this is the time for Ireland to develop a 2030 pathway based on 5-year carbon budgets that is aligned with the science and Ireland's fair share. As a rich nation with high per capita emissions, Ireland will have to do much more by 2030 and reach net zero emissions before the target date of 2050.

It is within this context that we underline with the greatest of concern and urgency that Wicklow County Council take ambitious steps within the next County Development Plan to make deep and fast

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[4] In terms of 2030 reduction targets the EU Effort Sharing Regulation (ESR) requires that Ireland reduce its non-ETS emissions by 30% on 2005 levels by 2030. The latest projections indicate that Ireland will exceed the carbon budget over the period 2021-2030 by 52 - 67 Mt CO2 . (See: https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2018-2040/Greenhouse_Gas_Projections.pdf ). As the European Union moves in 2020 to increase its 2030 targets (to an expected 55%), it is inevitable that Ireland's domestic 2030 target will also increase

[5] https://www.antaisce.org/sites/antaisce.org/files/jocca-getting-back-on-track-atcc-note.pdf

[6] Cain (2019) showing methane warming reduction: https://www.nature.com/articles/s41612-019-0086-4

cuts to emissions in order to protect communities in the mid to longer term from even deeper and more drastic and expensive cuts.

Climate change also impacts biodiversity and bird species. Changes in temperature and precipitation at different times of the year may result in changes to food availability and habitat distribution and energy expenditure for both resident and migratory bird populations that will likely have population-level impacts at varying temporal and spatial scales[7].

Habitat protection and ecosystem conservation can also help both mitigate and adapt to climate change.

**1.2 Biodiversity loss**

Globally biodiversity is facing significant pressure with 1 million species threatened with extinction according to the most recent report from IPBES[8]. Analysis of the IUCN Red List shows that there has been a steady and continuing deterioration in the status of the world's birds since the first comprehensive assessment in 1988, and at least 40% of bird species worldwide are in decline. The reasons behind these declines are many and varied but agricultural changes and expansion, overexploitation, pollution, disturbance, habitat loss and modification are all thought to be driving declines worldwide, while climate change may prove to be the most serious threat of all[9]. In Ireland two-thirds of our regularly occurring wild birds are red or amber listed Birds of Conservation Concern in Ireland[10]; there has been a 40% decline in waterbird species in less than 20 years[11]; and several of our most important species of which Ireland hosts regionally important numbers in a European context are under serious threat.

In addition to the above details on the status of Ireland's birds, the following is known :

- One third of our 99 wild bee species are threatened with extinction[12].
- 91% of our internationally important habitats have 'bad' conservation status[13];
- Water quality is in decline according to the most recent report by the Environmental Protection Agency
- Data from 17 County Hedgerow Surveys show that only 1/3 of hedgerows are in good condition for birds and other wildlife[14]

**The next County Development Plan must set Wicklow on a path of truly sustainable development where biodiversity protection is integrated into all facets of planning and development**. This means that development proposals **MUST avoid** sites that are important for bird species and other biodiversity. There needs to be greater monitoring of planning conditions to ensure that developments are not impacting bird species. Use of the precautionary principle must be strengthened significantly. In addition, there must be a coordinated effort, with other authorities, to address practices that are impacting bird species, habitats and water quality (ie. including burning of vegetation by landowners in the Wicklow uplands).

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[7] Lewis, L. J., Coombes, D., Burke, B., O'Halloran, J., Walsh, A., Tierney, T. D. & Cummins, S. (2019) Countryside Bird Survey: Status and trends of common and widespread breeding birds 1998-2016. Irish Wildlife Manuals, No. 115. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland. https://www.npws.ie/sites/default/files/publications/pdf/IWM115.pdf

[8] https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services

[9] BirdLife International (2018) State of the world's birds: taking the pulse of the planet. Cambridge, UK: BirdLife International

[10] Colhoun, K. & Cummins, S. (2013) Birds of Conservation Concern in Ireland 2014–2019. Irish Birds 9, 523–544.

[11] Burke, B., Lewis, L. J., Fitzgerald, N., Frost, T., Austin, G. & Tierney, T. D. (2018) Estimates of waterbird numbers wintering in Ireland, 2011/12 – 2015/16. Irish Birds No. 41, 1-12.

[12] All-Ireland Pollinator Plan 2015-2020. National Biodiversity Data Centre Series No. 3, Waterford

[13] DAHG 2014. Ireland's Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.

[14] Neil Foulkes (Hedgelaying Association of Ireland) pers comm

Ireland's National Biodiversity Action Plan (2017-2021) has a vision that 'biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally'.

Specific objectives are contained with the National Biodiversity Action Plan that related to the local authorities and the county development plants. Objective 1.1.6. states that *Local Authorities will review and update their Development Plans and policies to include policies and objectives for the protection and restoration of biodiversity.* In addition, local authorities are called upon in Objective 6.2.1. *to increase connectivity of the protected areas network using appropriate buffer zones, corridors, stepping stones and/or flyways.*

**2.0 Specific Points according to themes in the Issues Paper**

**2.1 Core Strategy and transport**

In relation to town and village development, appropriate planning supported by excellent public transportation is critical. Bray is identified as key town in the EMRA RSES yet it is choking in traffic on most days which impacts on quality of life as well as air quality. Wicklow County Council must address the issue of car-focused development in the county and to enable a move to much greater use of public transport and cycling.

The proposed upgrade of junctions on the N11/M11 to facilitate car use is not in line with what is needed to address greenhouse gas emissions in the county. It would be preferable if studies were undertaken to address the issues with congestion through public transportation and cycling options instead.

There are insufficient safe and connected cycling routes in Co. Wicklow. Increased cycling infrastructure should be seen as priority to get people out of cars and this must be significantly ratcheted up in the next Development Plan. We need towns and villages in Wicklow that have the physical grey and green infrastructure to encourage people to physically move their bodies and enjoy nature in their immediate surroundings.

The Issues Paper outlines that the Council is undertaking a feasibility study for a greenway along the Wicklow coast. BirdWatch Ireland has participated in the workshop on the study at Druids Glen. We are deeply concerned about the potential impacts of the suggested greenway route along the Wicklow coastline due to impacts on the Special Protection Areas for birds and also because of the location of the Little Tern colony on the shingle beach near Kilcoole. This colony is the most important Little Tern breeding colony in the country. It is being squeezed by the sea and by people. During the Little Tern breeding period BirdWatch Ireland wardens undertake 24 hour/7 day a week monitoring of the colony to protect it and do our best to ensure a successful breeding season. This has involved a significant amount of investment by Birdwatch Ireland and the National Parks and Wildlife Service. Encouraging more people to this area through a coastal greenway will be detrimental to the conservation efforts at the site and the long term viability of this colony.

BirdWatch Ireland supports greenways that help people get out of cars and moving physically; that help people enjoy nature and live more healthily. But we are fundamentally opposed to greenways that threaten already vulnerable waterbirds and seabirds. As stated above there has been a 40% decline in waterbird species in less than 20 years in Ireland. While climate change is a factor, disturbance to birds caused by people, dogs and development is a major factor. It is our view that greenways are sometimes suggested as the public transport offering to people to avoid inserting bike lanes/footpaths where cars currently travel and due to a lack of investment in regular everyday public transportation. These are honey pot routes with tourism potential but usually people have to drive to

get on them undermining their objectives to reduce emissions. Often their surfaces are made from tarmac and they should really be classified as small roads which are unsuitable in natural settings. Located close to areas sensitive to wildlife and these routes have the potential to drive the wildlife away. Greenways are important and should be built within a framework of cycling infrastructure within towns and villages. We suggest that greater focus is put on creating much more liveable, accessible and nature-filled towns and let our threatened wildlife have their safe spaces.

**2.2 Renewable Energy**

BirdWatch Ireland supports the deployment of renewable energy to meet our greenhouse gas emissions targets. However, this deployment has the potential to significantly impact bird species and habitats if located in areas that are sensitive to birds. BirdWatch Ireland has developed a bird wind sensitivity mapping tool which was rolled out in 2016 to all the local authorities and planning authorities in Ireland. It is a pre-planning tool (GIS based and available for free) in the toolbox which should assist wind farm developers, ecologists and communities to make good decisions on where to locate wind farms. The associated Guidance Document also provides important information on the sensitivity of bird species to wind farms. More information on the mapping tool can be found on our website here https://birdwatchireland.ie/our-work/advocacy-policy/climate-change/renewable-energy/onshore-renewables/. We suggest that this tool be referenced in the County Development Plan and the GIS layer is used by local authority planners to support any future renewable energy development strategies and applications.

In addition, offshore renewables also have the potential to impact bird species and so we have trialled a bird sensitivity mapping tool for marine renewables for 6 bird species in the Irish Sea. The final report outlining the factors to consider in relation to marine renewables as they relate to seabirds can be found here https://birdwatchireland.ie/our-work/advocacy-policy/climate-change/renewable-energy/offshore-renewables/. We hope to finalise this mapping tool for all species in Irish waters.

**2.3 Hedgerows**

Hedgerows are incredibly important features in the Irish landscape yet inappropriate cutting and removal of hedgerows is still a major issue and one that raises the ire of the public.

According to the December 2019 published Irish Wildlife Manual 116 'Countryside Bird Survey (CBS): Status and Trends of Common and Widespread Breeding Birds 1998-2016' 'Ireland's substantial network of hedgerows supports a rich biodiversity ranging from small rodents, badgers and hedgehogs to birds, invertebrates and fruits. These vegetated field boundaries, which in today's Ireland, largely define the borders of grass fields grazed by livestock, act as a substitute for scrub and woodland in otherwise relatively monoculture landscapes. They provide important habitat for a range of bird species both for nesting and feeding. Hedgerows, especially older ones, contain a diverse variety of plants which in turn produce a diversity of berries, seeds and nuts, many of which are a direct food source for birds. Hedgerows also support a diverse range and abundance of invertebrates – an important source of food for many bird species, including those normally granivorous species (finches and buntings) which need a ready supply of invertebrates to feed developing young during the breeding season. The complete removal of hedgerows or the cutting back of the foliage and branches during the breeding period, depletes the availability of these foods and can directly destroy nests of many species within the hedgerows. The Yellowhammer, a red-listed species which has declined and contracted its range significantly in the last fifty years and whose nesting behaviour extends well into August would be particularly vulnerable to ill-timed hedgerow management activities. Therefore the conservation of Ireland's hedgerows and their

management, underpinned by appropriate legislation and agri-environment schemes is integral to the conservation of many of Ireland's countryside bird populations'[15].

As noted earlier only one third of Ireland's hedgerows are in good condition for birds and other wildlife. We urge the Council to strictly enforce national legislation in relation to hedgerows and to ensure that County Council hedgerow contractors have the skills and qualifications to undertake appropriate management of hedgerows to benefit wildlife aswell as road safety. A review of the Section 70 of the Roads Act notification procedures should also be undertaken. Sightlines are important for developments but too often hedgerows are removed when there is no need and also there is no mitigation for the loss of habitat. While a new hedgerow will not replace like-for-like an old hedgerow, at the very least they should be replaced on the same site. Sightline policies should be reviewed within the Council to ensure maximum preservation of County Wicklow's hedgerows.

EPA research suggests that hedgerows and non-forest woodlands could potentially sequester 0.66–3.3t CO2/ha/year[16]. Greater protection and retention of Wicklow's hedgerows would provide a double impact of helping wildlife and reducing greenhouse gas emissions.

**2.4 Upland Burning and peatland management**

According to the December 2019 published Irish Wildlife Manual 116 'Countryside Bird Survey : Status and Trends of Common and Widespread Breeding Birds 1998-2016' 'Illegal closed-season burning of agricultural lands, particularly upland and lowland bog and scrub areas, has been well-documented in Ireland in recent years. Such activity results in direct losses of early nests in such areas as well as losses in extent of suitable bird nesting and feeding habitats for several years. 'Food Wise 2025' plans to significantly increase agri-food exports in Ireland in the coming years leading to more intensive agricultural activity at various spatial scales. Although Food Wise 2025 highlights the need for sustainability, there are concerns that such a significant and rapid increase in agricultural outputs will come at a cost to birds and biodiversity. Burning as a 'grassland management tool' for agriculture in Ireland, particularly of scrub habitats, is likely to continue in the foreseeable future in a bid by landowners to avail of more grazing lands, to meet production targets and to increase the area included under the Single Farm Payment schemes (DAFM 2019). The CBS species most affected by upland burning, particularly uncontrolled burning, include Skylark, Meadow Pipit, Stonechat, Reed Bunting and Linnet. Given that these are widespread and relatively numerous species, burning for agriculture is currently considered a low-level pressure and threat, although there may be more noticeable effects at local level depending on the extent and frequency of burning and habitat removal. Mechanical extraction of peat, at an industrial and/or individual/private scale, is similarly damaging to species such as Skylark, Meadow Pipit and Skylark, and constitutes direct loss in extent of nesting and feeding habitat'.

Over 28,000ha of Natura land (SACs and SPAs) have been burnt between 2011-2016[17] releasing carbon into the atmosphere, degrading habitats, impacting on the species supported by these habitats including critically endangered Hen Harrier and Curlew who breed in the uplands and stymying our goals to achieve favourable conservation status of these habitats as per the Habitats Directive.

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[15] Lewis, L. J., Coombes, D., Burke, B., O'Halloran, J., Walsh, A., Tierney, T. D. & Cummins, S. (2019) Countryside Bird Survey: Status and trends of common and widespread breeding birds 1998-2016. Irish Wildlife Manuals, No. 115. National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht, Ireland. https://www.npws.ie/sites/default/files/publications/pdf/IWM115.pdf

[16] Black et al(2014) Carbon Sequestration by Hedgerows in the Irish Landscape, EPA, Wexford available here http://www.epa.ie/pubs/reports/research/climate/ccrp-32-for-webFINAL.pdf

[17] Data from Irish Government reports to European Forest Fire Information System, Forest Fires in Europe, Middle East and North Africa 2016. EUR 28707 EN, Publications Office, Luxembourg

BirdWatch Ireland undertook research in 2017 which identified the costs to the exchequer of the deployment of fire fighters to address out-of-control fires in upland areas. Results from Freedom of Information requests to all local authorities resulted in responses from 10 local authorities on the scale of the expenditure. Wicklow County Council did not provide any information. The costs to the exchequer between 2010-2016 for local authorities to deploy fire services to fight 5889 fires was (conservatively) 6.1 million euro.

Upland burning not only impacts on bird species but it releases carbon and increases greenhouse gas emissions, and impacts water quality. Degraded peat habitats continue to release carbon unless they are restored. Peatland restoration, inconjunction with the other authorities, should be considered by the local authority where possible. It is critical that farmers are encouraged and supported to farm in harmony with the habitats they operate in.

**2.5 Coastal zone management**
Consideration should be given at county level to exploring opportunities where managed retreat might be facilitated at coastal sites. The Wicklow coastline is eroding and the Wicklow County Adaptation plan has identified repeated damage to certain parts of the coastline from extreme weather events.

**Conclusion**
Our key message in this submission is that the next Wicklow County Development Plan must address both the biodiversity and climate emergencies and plan for infrastructure and development through the lens of both of these realities. We are running out of time and the period 2021-2027 is critical. Wicklow County Council has the opportunity to be very ambitious to protect, support and lead the people of Wicklow in the critical decade ahead.

Yours sincerely,

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