

## **Submission to Draft Leitrim County Development plan 2023- 2029 by Maria Cullen and Dorothee Kolle**

### **Response re Biodiversity and related sections**

Living in North Leitrim this response mainly addresses areas in North Leitrim, but the general understanding of biodiversity and conclusions apply to conservation measures in South Leitrim also.

"...Biodiversity is about more than plants, animals and their habitats. It is a measure of the species present in a site or area and it involves the interconnectedness and interdependence of all living things, including people and their need for food, clean water, fresh air and shelter, which highlights the importance of biodiversity for us all. Changes in biodiversity are now considered to be a key test of sustainable development.

Plants and animals depend on each other for survival and are each uniquely adapted to their own role in their natural environment. When we damage biodiversity we upset the delicate balance of nature, which may have long-lasting and far-reaching consequences not just for ourselves, but for the living world around us."

(Co. Wexford Biodiversity Action Plan 2013-2018). The UN Convention on Biological Diversity was signed at the Rio Earth Summit in 1992 and was ratified by the Irish government.

Leitrim has, so far, over one thousand recorded species across the biological groups (1027 species recorded between 2010 and 2022. Source: NBDC data). Thousands of species remain unrecorded as yet. A handful of species are protected and there are huge swathes of insect groups, fungi and bacteria for example that are not recorded or under recorded even though expertise may be available. This issue needs to be addressed with more funding and with drawing on and listening to field studies experts such as Howard Fox (Botanist), Dr. Robert Meehan (Hydrogeologist) and others. While Citizen Science is wonderful for enthusiasm, awareness and education, specialist Irish biologists are required and not just on a volunteer basis. The care for the environment and knowledge of local citizens and farmers about it has to be listen to and supported through enforcing protection by Leitrim County Council.

Stocktaking of biodiversity has to be intensified to identify more areas to be protected as Special Areas of Conservation. On page 227 in Volume 1 of the Draft Leitrim Development plan some protected areas are listed (SACs). SPAs, NHAs, pNHAs and GHAs as well as any relevant OSPAR, RAMSAR and other Convention sites and all protected species should be listed. A red data list of endangered species has to be taken into account to improve and restore damaged environments. Red lists must be protected by legislation. The bar is set too high when we only protect Annex species and those that are mentioned as Natural 2000 Qualifying Interests.

Considering that the aforementioned protected areas are all connected and mountain ranges lead into each other and even go beyond towards Fermanagh and

Cavan Geopark areas, the aim should be that all connected mountains, uplands lakes etc. in North Leitrim are awarded SAC status and be fully protected. Leitrim Co. Co. needs to work towards this and protect the biodiversity - not extensively studied yet - and the free movement of animals, birds, insects and protection for their natural habitats that includes mosses, liverworts, algae, ferns, horsetails, lichenised and non-lichenised fungi and bacteria. There is no point in looking after a handful of species of birds and mammals without taking detailed care of their foraging, shelter and other habitat requirements and their integrity too.

Protection of biodiversity, bogs and wetlands have to be listed as top priority in the development plan as vital for not damaging the balance of nature and to contribute to sustainable development and acting as carbon sinks.

There is a strong connection between geologically important areas (GHAs) and Biodiversity. SACs, Geological Heritage areas, Heritage sites, Areas of Outstanding Natural Beauty (Northern Ireland concept) and areas of High Visual Amenity as well as High Conservation Value area have to be considered and protected as interdependent, interrelated and connected.

Any development that would upset the delicate balance and importance of undisturbed areas (as mentioned in Leitrim's Biodiversity Plan) has to be protected by legislation, An Bord Planeála and National Parks and Wildlife Service as well as OPW and any other state or semi-state body. Strict observation and protection of water quality that encompasses ground water, rivers, lakes, and to mention here in N/Leitrim or example Lough McNeen and Lough Melvin and in this context habitats of otters, curlew and other protected and regionally important species has to be implemented and enforced.

In the appendix to the Development Plan 'Leitrim Landscape and Visual Capacity Study for Wind Farms and Wind Turbines' the interrelationship is acknowledged, but there is no overall protection and conservation in the summary and conclusion. The conclusion that areas of commercial forestry devalue areas around Dough Mountain, Saddle Hill etc. draws a dangerous conclusion. Any alteration through the impact of new infrastructure, draining bog land, noise and night light pollution and disturbance in remote and uninhabited tranquil areas will have consequences for biodiversity, sustainability (e.g. bogs) and scenic value.

The same considerations and protection apply to the exploration and mining of base metals e.g. Copper and Zinc as well as gold, antimony and other extractive industries. There is a growing body of evidence that the mining of gold is an energy intensive and carbon heavy process that has the potential to negatively impact on a wide range of areas including water quality, landscape, agriculture, tourism and biodiversity amongst others. The nature of the industry is also not compatible with the sustainable future that we are trying to create for this and following generations. The possible development of such extractive industries would be incompatible with our obligations to urgently tackle climate change and the worst impacts of the climate emergency.

Leitrim Co Council needs to address the negative impact of commercial forestry (non-native Sitka Spruce and Lodgepole Pine) and to commit to work together with Coillte and private owners to restore these areas through planting indigenous deciduous trees plus Scots Pine, Yew and Juniper where appropriate.

The overall priority with all decisions and aims and objectives in the development plan has to be the environment as illustrated in the Sustainable Development Goals (SDGs 2015-2030): the broad base for society is the biosphere and the economy has to be determined through those two.

The protection of fragile ecosystem, as highlighted in the Draft Development plan needs thus to be specified which areas need special protection (see above) and what other practices in the past need to be reconsidered and addressed. For example, spraying invasive species will also have adverse effect on other species around it and, if water is nearby, potentially instream and downstream species.

Awareness about biodiversity and how to conserve it and what will damage it (e.g. using biocides) has to be raised across all sectors using media, training and innovative approaches such as information signs alongside walkways with artistic illustrations.

There is a tendency to rely on a top-down approach in the Leitrim Development Plan and Biodiversity Action Plan rather than tapping into and supporting the local communities who know the place best. There is little incorporation of local expertise into funding rounds to date but there is an overdependency on volunteer support that is not sustainable.

Clearing of woodland for agricultural land is unacceptable. Threats and forced return of SFP monies are wrong in areas where the trade-off between farm animal stocking densities and poaching of land and soil insecurity as well as resultant water pollution are not fully taken into consideration by the powers that be in the context of Co. Leitrim.

Cutting and flaying of hedgerows and tree removal takes place even in the Spring-Summer season and is unacceptable. No one is held to account. Apart from basic health and safety reasons, no hedgerows particularly biodiverse hedgerows should be flayed or cut excessively.

Breach of water quality for human health and for other organisms as well. Significant cyanobacterial films are present on lakes between March and December. The species involved can produce toxins, some of which are extremely potent and can be absorbed through skin. This issue is a very serious one for the region and is not being addressed. In the case of Upper Lough MacNea, a very rural area for the most part, the contamination of lake water appears to be from agriculture, forestry and septic tank leakage. This can be addressed so that there is safe bathing water and good quality water for bird life that includes Curlew on Upper Lough MacNea, Otters also present and all other species interacting with lake and stream waters of Co. Leitrim.

MCPA is a herbicide used to control rushes in fields. There have been breaches to water quality in Leitrim waters as a result of its use. This poses dangers to life and needs to be phased out. Leitrim is home to The Organic Centre and there is a lot of Organic Farming in the region. Timely cutting of rushes to protect wildlife e.g. Ringlet, Marsh Fritillary, Silver Washed Fritillary and Dark Green Fritillary Butterflies and many other lifeforms, especially pollinating insects, is required.

Air quality is taken somewhat for granted in Leitrim. However, monitoring and controls for industry, homes, towns, transport and particularly in the case of Ammonia from farming and Particulate Matter (PM 2.5 and PM10) are required to help to protect human health and biodiversity.

While general, positive and aspirational comments are welcome in the Leitrim Biodiversity Action Plan, concrete steps need to be stated and implemented.