

As an invertebrate ecologist who has recently moved to Ferbane, I am delighted to see such an extensive chapter on biodiversity and landscape in the Offaly County Development Plan. I have worked with Amanda Pedlow, Offaly's Heritage Officer, on biodiversity related art projects in Geashill and Kinnity and I believe she is an excellent influence on Offaly's biodiversity policy. In particular, her support of Offaly Naturalists' Field Club and the moth recording scheme are steering Offaly in the right direction for biodiversity conservation, and deserve a mention in the County Development Plan. I have a number of suggestions for enhancing the plan. I would love to see a commitment to education and awareness raising about biodiversity. This is essential, as management plans will only be successful if the general population is on board with them out of an understanding and love of nature, rather than for short term, unsustainable financial incentives. I would also like to see support for recording schemes in conjunction with the National Biodiversity Data Centre, such as the All Ireland Ladybird Survey and the Garden Butterfly Monitoring Scheme, to bolster our understanding of the species living in Offaly and their significance in the context of Ireland and Europe. Gathering of baseline data by ecologists will also be important in monitoring the effects of management plans. It would be wonderful to see initiatives included in the plan where owners of land at any scale would be encouraged and incentivised to embrace rewilding, regenerative agriculture, and growing their own organic food. I believe rewilding, a management approach which restores land to its natural uncultivated state, should be encouraged wherever land is not needed for agriculture or sports, as an easy and effective way of supporting biodiversity, providing habitats and green corridors for wildlife. While the biodiversity section of the County Development Plan covers many of the important goals we should be working towards and lists many of the designations and legislation already in place, certain parts of it are not written in language which would encourage stakeholders who are not already enthusiastic about the plans to become so. For example, in section 4.3.2, "It is a requirement under the Planning and Development Act 2000 (as amended), for a County Development Plan to include objectives for the conservation and protection of Natura 2000 sites (European sites) and other sites. A Planning Authority must have regard to any European Site when making a decision in relation to a plan or project." This paragraph makes it sound as though the council is reluctant to take responsibility for protecting Offaly's essential and unique habitats. It does not capture or convince others of the benefits of doing so, and this may be necessary in order to get all stakeholders on board. Similarly, in section 4.7, "National environmental policies are dictating that domestic turf cutting on these designated raised bogs will be phased out over the coming years."

Again, this sounds as though the council is not on board with these policies and only implementing them unwillingly, which I imagine is not the case. I think it might benefit those affected negatively by the policies and by the loss of Bord na Móna jobs if the plan included more information on the reasoning behind them, the opportunities it will present for people and wildlife, and any initiatives planned which will help people to adjust to the transition. The plan could work towards providing biodiversity training and related job opportunities. Perhaps this transition plan is covered elsewhere in the County Development Plan. I would also recommend that the plan should steer its approach away from valuing nature solely as a capital which provides services to humans, and begin to recognise that nature has an integral right to exist and thrive for its own sake, independent of our needs. This should at least be mentioned in the plan, perhaps in section 4.1. Ignoring this reality for so long is what has brought about the global environmental crisis, and it is only through a more accurate perspective on our role in the ecosystem that people will understand the changes we need to make to mitigate this crisis. Having said that, the services provided by nature are a great place to get people interested. One of these is the flooding prevention provided by trees and other vegetation. This does not seem to be widely known by the public, and could perhaps be outlined more explicitly in the plan. For example, in Table 4.1, where it lists natural hazard regulation in regulating services, flooding could be specified. It could also be added to this sentence in section 4.9, "Trees, forestry and hedgerows make a valuable contribution to the landscape and visual amenity of County Offaly and provide wider environmental benefits that include carbon storage" (and flood prevention). Also in Table 4.1., under habitat services, it mentions provision of habitat for migratory species. Perhaps "and native species, and increased abundance of living things" could be added to this. The mental and physical benefits of biodiversity should also be recognised and listed under a health services section in this table. It would also be ideal to place more of an emphasis on the conservation of existing, intact, long established habitats, as a priority over planting native plants and rehabilitating (although these also have important benefits). For instance, in section 4.8. "The number of wetland landscapes in the county is expected to increase post Bord na Móna harvesting, as part of the targeted rehabilitation." Rehabilitation is, of course, to be commended. It will ensure carbon sequestration and can restore some ecosystem services, many generalist species and some less common ones. However, it is important that we do not consider rehabilitated or created habitats as equivalent to long-established habitats when it comes to biodiversity, as the latter are essential for rarer specialist species. Similarly, in section 4.9 which reads, "There will be a firm presumption against the

removal of hedgerows to facilitate development unless an equivalent compensatory length of native hedgerow is proposed”, it is important to note that newly planted hedgerows are no substitute for old well established biodiverse hedgerows and should be a last resort. Section 4.9 should also include a reminder about the dates between which hedge cutting is legal, some information on the best way to cut hedges for biodiversity, and the potential for assessing the heritage significance of hedgerows using the Hedgerow Appraisal System, as we have done at Coole Eco-Community. https://www.biodiversityireland.ie/wordpress/wp-content/uploads/Hedgerow_Appraisal_System.pdf

The growing interest in eco-villages featuring clusters of small low-impact housing will provide developers with the opportunity to work with and around the landscape’s existing natural features and minimise the impact on biodiversity, provided the Offaly County Development Plan includes provisions for the development of such initiatives. I understand the White-Tailed Eagle and Golden Eagle are sometimes seen in Offaly, and should perhaps be included in Table 4.4. Occurrence in County Offaly of birds protected under Annex 1 of the EU Birds Directive. Scientific names in species lists would be preferable, avoiding confusion over different colloquial names. It is good to see the All Ireland Pollinator Plan in section 4.11, but it’s not clear from this document how the council plans to engage with it. It should be noted that just planting pollinator friendly trees and plants is not sufficient (and in some cases where they replace existing wild plants it can be more detrimental than beneficial). We also need a shift from over tidying and “creating” habitat to rewilding and allowing nature to progress organically and do what it does best (with some management where that has been shown to bring about the most biodiversity, e.g. light grazing of heathland and flower-rich grasslands). This includes leaving dead leaves, dead wood and other debris to provide shelter, nest sites, hibernation spaces for all invertebrate species, not just providing flowers for honeybees. Many insects, including pollinators, have specific larval food plants which are not on the list shown in the biodiversity plan. It should be mentioned that preserving existing wild vegetation should be considered as the first choice, or allowing what is already in the seed bed to come up in time and encouraging it with a nature-sensitive mowing or grazing regime, before introducing plants or seeds from outside the locality is considered. I am delighted to see that mature trees will be managed with tree surgery rather than felling. This point (BLP-24) mentions when trees contribute to amenity, but could also mention biodiversity conservation, as old, hollow, decaying trees and dead wood are a scarce and important habitat, particularly for uncommon insect species. Point BLO-01 states, “It is an objective of the Council that development occurs within environmental

limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of County Offaly's natural capital." I would like to add that the county's environmental policy should be planned through the lens of its global impact too. Climate change has major implications for biodiversity, and vice versa, and Offaly can make a significant contribution to mitigating the environmental crisis, particularly through bog conservation, regenerative forestry, and enabling the development of low impact eco-villages.