WEN response to Wexford County Council Local Biodiversity Action Plan pre-draft public consultation

Challenges for Wexford's Biodiversity

County Wexford faces an unprecedented biodiversity crisis requiring urgent and co-ordinated action. This submission by Wexford Environmental Network outlines some of the challenges involved, along with goals, priorities and actions to help with halting biodiversity loss while building climate resilience.

Recent ecological surveys indicate alarming declines in key indicator species across Wexford and significant deterioration of water quality in over 60% of our river systems. Without immediate intervention, these trends will accelerate, undermining both natural systems and the local economy. We face ecosystem collapse in our most vulnerable habitats within 5-10 years, with cascading effects for our food security and wildlife.

We call for a transformative Biodiversity Action Plan that prioritises protection of remaining habitats, large-scale restoration of degraded ecosystems, and similar biodiversity actions among all stakeholders. Only through decisive action and co-operation can we ensure Wexford's natural heritage survives for future generations.

The following items are a small selection of challenges that need to be addressed -

1. **Habitat Fragmentation and Loss**:
   Continued development of land, related infrastructure, and intensive agriculture have severely fragmented or destroyed natural habitats, isolating wildlife populations and disrupting ecological connectivity. Removal of hedgerows continues at approximately 1.5% annually despite their critical importance as wildlife corridors.

2. **Water Quality Deterioration**:
   Only 40% of Wexford's water bodies currently achieve "good ecological status" under the Water Framework Directive. Agricultural pollutants, litter, poorly functioning septic tanks, and urban wastewater continue to degrade our rivers, lakes and coastal waters. Lady's Island Lake represents a stark ecological warning of what happens when we fail to act decisively.

3. **Wetlands Damage**:
   Over 75% of Wexford's original wetlands have been lost through drainage and land reclamation. These ecosystems are critical for flood protection, carbon sequestration, water filtration and biodiversity.

4. **Lack of clear and urgent focus**

   A lack of urgency, weak legislation relating to the protection of biodiversity, lack of co-ordination and insufficient resources, all contribute to the challenges facing biodiversity in Wexford. The Local Biodiversity Action Plan should have clear and measurable targets**,** as well as goals and key performance indicators (KPI's). Without clear and measurable targets, it will be difficult to evaluate if the goals of the LBAP are met.

   The previous BAP (2013-2018) did not achieve full implementation of the 34 actions partly due to insufficient resourcing and accountability. A review of these actions may help to avoid similar issues arising in the new LBAP.

5. **Conflicting Land Use Policies**:
   Intensive farming and commercial forestry policies include measures which can contradict the objectives of biodiversity action plans, creating conflicting messages for landowners and communities. We cannot effectively address biodiversity loss while simultaneously incentivising habitat destruction. The Council's strategy for climate mitigation and adaptation through Nature-based approaches / solutions, should prioritise solutions or approaches that have a clear positive impact on nature and biodiversity

6. **Coastal and Marine Areas protection**:
   Deterioration of coastal dune systems arises from recreation pressures, sea level rise, and impacts from storms and changing weather patterns.
   Marine life is being very negatively impacted by pollution from plastics, etc.

7. **Interaction between stakeholders**
   A clear relationship between the Council and each stakeholder should be indicated or established, if one does not exist. For example, the relationship between the Council and the National Parks and Wildlife Service. The NPWS is obliged to set out management plans for all the Natura sites. The LBAP should ensure that all the Natura sites in Wexford have management plans, with clear responsibilities and proper resourcing to implement the plans.
   Another example is the Water Action Plan 2024. There are actions set out to reduce the pollution on water bodies as a result of agriculture. Yet whilst there is a role for the Council - through Agri 2 and Agri 9 of the document, it is still unclear who is responsible for addressing the pollution, for example, the ecological disaster facing Lady's Island Lake.
   How will this be addressed in the LBAP?

Strategic Goals to protect Wexford's Biodiversity

We propose the following strategic goals :-

1. **Identification and Protection of Significant Biodiverse Habitats -**
   via agreements with all relevant state bodies, landowners and local communities to protect habitats (including bogs, hedgerows, wetlands, native forests, trees beside water bodies) throughout the county, in a similar manner to Protected Structures. A clear strategy is needed on how to protect wildlife and biodiversity outside of the Natura sites throughout the county.

2. **Achieve Good Water Quality Status -**
   via the restoration of all water bodies to good ecological status in conjunction with relevant Directives, legislation, and support from various parties involved.

3. **Annually Increasing Support from Wexford Co. Council for Biodiversity Protection -**
   via dedicated funding, additional enforcement action, and all policies and services reviewed to fully protect and enhance Biodiversity in Co. Wexford.

4. **Empowering Community Action** -
   via the provision of suitable supports for community led biodiversity action initiatives in every parish.

Proposed Actions: 2025-2030

The following actions are recommended by Wexford Environmental Network to help establish new and identify existing biodiverse areas and habitats in need of protection, restoration and management. They are also intended to assist with the allocation of sufficient resources by all state bodies participating in the Action Plan. The actions proposed are divided into a group of 5 high priority areas and 7 areas for a variety of actions, while having regard to the level of urgency involved and resources needed.
It is vital that Wexford Co. Council leads by example to support the actions required.

Immediate Actions (Year 1-2)

Lady's Island lake (SPA & SAC) represents a stark ecological warning of what happens when we fail to protect our most unique areas of biodiversity. A recent study concluded that this is one of the most eutrophic (nutrient-polluted) lakes in Ireland. Landowners need to be encouraged to implement proposed restoration measures, and immediate action is required to stop ongoing pollution of this lake as a matter of urgency.
Restoration of the lake will require considerable work, time and funding, and this also needs to be addressed in conjunction with adjoining landowners and all parties involved. The urgency and extent of action taken to protect the lagoon will be seen as a prime signal of intent and effectiveness of the new Biodiversity Action Plan.

1. **Lady's Island Lake**
   - Utilise Water Pollution Acts to stop any unlawful discharges into the lake.

2. **Enforcement and Funding**

   - Establish Biodiversity Emergency Response team to respond urgently to damage to habitats being preserved under the Action Plan.
   - Increase enforcement action for unauthorised development involving habitat destruction. The Council should launch a media campaign, highlighting the penalties for pollution and wildlife crime and encourage the public to report such incidences.

- Allocate minimum €450,000 annual budget for biodiversity intervention and Capital budget €3.5 million over 5 years for habitats restoration.
- Seek funds from the €14 billion Infrastructure, Climate and Nature Fund and €3.15 billion Nature Restoration Fund.

3. **Launch Wetland Restoration Programme**

   - Map all remaining wetlands and potential restoration sites by December 2025, to help replace 75% of Wexford's original wetlands which have been lost through drainage, development and land reclamation. These ecosystems are critical for flood protection, carbon sequestration, water filtration and biodiversity.
   - Secure agreements with landowners to preserve or restore 2 wetlands in each townland and restoration of 250 hectares of wetland by 2030.
   - Prioritise sites with multiple benefits for biodiversity, flood protection and carbon sequestration, and establish monitoring protocols to document ecological recovery.

4. **Preserve Hedgerows, Native Forests and Woodlands.**

   Hedgerow removal continues at approximately 1.5% annually despite their critical importance as wildlife corridors. Preservation measures can include –

   - Map strategic hedgerow networks and existing pockets of native forest for preservation, to help protect rivers and streams from agricultural pollution, and to reduce soil erosion.
   - Develop 5 demonstration sites for biodiversity friendly hedgerows, and create hedgerow corridors between woodland habitats.
   - Adherence to and stricter enforcement of “no destruction of vegetation growing in any hedge or ditch” between March 1st and August 31st.

5. **Support Community Empowerment and Engagement**

   The Biodiversity Action Plan needs to prioritise meaningful community involvement in various forms such as monitoring and protecting habitats, Community Biodiversity Action Plans, Education and Awareness, to encourage greater participation by local residents, businesses and landowners. Relevant activities can include :-

   - Incorporate existing community biodiversity action plans undertaken by local groups or at least establish how such local community plans are linked into the countywide plan.
   - Volunteers to survey, monitor and report on biodiversity habitats using standard protocols for reports, baselines for targeted sites and species.
   - Participate in annual "Biodiversity Awards" events similar to the Environment Awards to recognise community and business leadership.

Medium-Term Actions (Years 3-5)

1. **Establish Countywide Biodiversity Network**

    - Complete habitats mapping at 1:5000 scale and start on sites with multiple benefits for biodiversity, flood protection and carbon sequestration. Include a map in the Plan for reference to indicate the main land uses and these locations in Co. Wexford e.g. Farmland, Forestry, Parkland / Amenity, Conservation areas, Urban.
    - Identify critical corridors, core areas and stepping stones.
    - Create legal protection mechanisms for identified networks similar to Protected Structures status.
    - Develop management plans for key connector habitats and target 50% increase in connectivity from 2026 to 2030.

2. **Agricultural Farming Supports for Biodiversity Protection**

    - Establish demonstration farms showcasing biodiversity-friendly practices in each soil type.
    - Support 200 farmers to transition to wildlife-friendly farming through local payment and awards scheme.
    - Develop local products branded on biodiversity credentials.
    - Create farmer-to-farmer knowledge exchange network.
    - Target 20% of agricultural land as wildlife friendly managed by 2030.

3. **Urban Biodiversity Enhancement**

    - Convert 50% of urban public parks and green spaces maintained by the Council to wildlife friendly management.
    - Seek support from residents associations, local communities, clubs, businesses and landowners to convert part of their lands to wildlife friendly areas.
    - Create 5 urban pocket forests in each urban centre.
    - Implement clear biodiversity friendly lighting policies across all urban areas, sports clubs, commercial premises etc, and particularly in areas managed by the Council with the aim of minimising the impact on wildlife such as bats, birds, etc.
    - Develop green roof and living wall demonstration projects.
    - Map the main towns' habitats and existing green areas and if possible connect a few as wildlife corridors, or as corridors from town into the countryside. Include schools in this work so it doubles as an awareness-raising project.

    - Establish community wildlife gardens in each housing estate.

4. **Biodiversity Protection with Council Maintenance Work**

   - Eliminate pesticide use on land managed by Wexford Council and by state bodies located in Co. Wexford except for invasive species control.
   - Implement biodiversity friendly lighting policy (such as reduced lighting after 12pm) for public streets and parks, and property owned by Wexford Co. Council and by any state bodies located in Co. Wexford.
   - Train all outdoor staff in biodiversity-friendly maintenance practices.
   - Lead river bank litter clean-ups to remove plastic waste along with enforcement action to help reduce water contamination.
   - If the Council is subcontracting work such as hedgerow cutting, river cleaning, etc. the subcontractors should undergo training in how to do the works with minimum impact on wildlife and biodiversity.
   - There should be a planting strategy for all Council owned land (roadside verges, public parks etc.) that prioritise native species.

5. **Planning & Development supports**

   - Require biodiversity enhancement plans for all new developments.
   - Provide supplementary planning guidance on biodiversity friendly development.
   - Ribbon development and biodiversity loss (e.g. native hedgerows, wetlands, trees, etc) needs to be addressed. This loss also occurs through the development of housing estates on the fringe of existing towns and villages. The Council can use metrics such as Biodiversity Net Gain and/or Green Space Factor etc. to be included in the planning permission.
   - The Council should undertake a Tree Survey for the County to include individual trees, all the pocket forests and woodlands with a view to developing Tree Protection Orders for those with a high biodiversity/heritage value. The Tree Survey should also inform the County Tree Policy.
   - Establish tree preservation orders for all mature trees in urban areas.

6. **Policy Integration**

   - Screen all Council policies for biodiversity impacts and conflicts.
   - Align climate action and biodiversity plans to maximise co-benefits.
   - Develop biodiversity procurement policy for Council contracts.
   - Establish biodiversity checklist for all Council decisions.

7. **Reporting, Monitoring & Accountability**

   - Publish annual Biodiversity Action Plan Implementation report in March
   - Develop dashboard of critical biodiversity indicators with public access.
   - Arrange mid-term review of LBAP implementation and report twice yearly on LBAP progress for public records.

Resources Required

Successful implementation of the Action Plan requires appropriate resources as indicated below, although subject to sufficient funding being available :-

- Additional staff including 4 dedicated biodiversity staff or specialists with relevant expertise in habitat restoration, surveying, planning and community engagement,
- A Biodiversity Officer at senior management level,
- Training programmes and biodiversity achievement awards for staff,
- Annual revenue budgets (€450,000) and Capital budget (€3.5 million),
- Biodiversity grant scheme for community projects (€100,000 annually),
- Structured approach to leveraging external funding (EU LIFE, Heritage Council, Just Transition), and seek innovative financing via the commercial sector, bioregion approaches, crowdsourcing.

- Actions in the LBAP must be properly resourced and clearly indicating who and what organisation is responsible for each action with contact details also provided.

Consequences of Inaction

Failure to implement a robust, well-resourced Biodiversity Action Plan is likely to have significant impacts including :-

- Loss of species, pollinators and agricultural produce decline,
- Reduced carbon sequestration capacity, food security and tourism potential,
- Increased infrastructure costs and more damage from flooding and erosion,
- Failure to comply with EU legislation and potential penalties.

Conclusion

Wexford stands at a critical juncture for biodiversity. The continued degradation of our natural heritage is not inevitable – with decisive action, adequate resources and community engagement, we can reverse current trends and create a county where both people and nature thrive.

This Biodiversity Action Plan represents perhaps the last opportunity to prevent irreversible ecological damage. We urge Wexford County Council to approach this challenge with the urgency, ambition and resources it demands. Prioritised actions, targeted areas, and measured progress will help to ensure that maximum biodiversity impacts, best value for money, and better progress is obtained from this Action Plan.

Wexford Environmental Network will support LBAP implementation through practical conservation work, community engagement, and ongoing monitoring. Together, we can ensure that County Wexford remains a place where biodiversity is protected, and where the next generation can experience the wonder of nature in all its diversity.

Submitted by ***Wexford Environmental Network -*** *May 29th, 2025*

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