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Environment, Conservation and Community organisations

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## Cover Letter

Members of the National Peatlands Park Group: Irish Peatlands Conservation Council, Birdwatch Ireland, Butterfly Conservation Ireland, Kildare Bat Group, Wild Kildare, Lullymore Heritage and Discovery Park, Ummeras Community Development Association, Public Participation Network - Environmental Pillar, independent Kildare based Ecologists

## Observations:

### Peatland Conservation importance in the national context of climate, biodiversity, and human wellbeing

**Chapter:** Volume 1 - chapters » 1. Introduction and Context

**Topic:** 1. Introduction

#### Summary points

- Welcome leadership of KCC shown in the plan to harness our natural assets for nature, environment and the public good.
- Approximately 72% of the county's population live on 5% of the county's total land area. The importance of maintaining open spaces, **harnessing natural assets** in Kildare for human wellbeing and as a counter-balance to development and habitation pressures on nature and our environment cannot be overstated. We therefore welcome the inclusion of the National Peatlands Park across multiple chapters recognising the centrality of the concept for the local economy, energy, climate, biodiversity, water quality, healthy rivers, flood management, tourism and amenity.
- The once in a lifetime opportunity of rewilding state-owned land held by Bord na Mona creating a **National Peatlands Park of scale**, will not only help Kildare achieve its carbon and biodiversity targets - it also has the potential to transform the lives of rural communities, reconnect people to their landscape and offer sustainable employment for generations to come.
- We welcome the objective to achieve 27%-30% for nature up from 3%
- Welcome the anticipated overall impact of the Plan for people, place, climate and nature.
- The core-corridor-stepping-stone model is a welcome and novel approach in the plan. However, each "core" should encompass a **landscape scale critical mass of habitats** to ensure population recovery and survival, abundance, productivity, genetic diversity and species richness. This model at scale will greatly contribute to reaching our EU Biodiversity Strategy goals in 2030.

The structure of the plan with aims, objectives and actions for each chapter is welcome. However, in some

- case the actions do not match the aims and objectives. It would be helpful if all the actions were assembled together with indicative times and responsibility for each action. This will make the task of **measuring and evaluating implementation** easier as set out in Ch 16 .
- The objective of 50% of peatlands to be excluded from development is in conflict with the benchmark set for other extractive industries. Why this figure and not 80% as indicated for quarries? Is this 50% of all the peatlands in Kildare i.e. 5000ha or is it 50% of each bogland area. In the case of the Bog of Allen complex 50% would cover 3500ha. In the case of Kilberry bog, 50% of this much smaller but high nature value bog would put the bog beyond natural recovery or rehabilitation. We welcome the proposals for biodiversity after-use of post industrial sites in the extractive industry. The figure of 80% of former quarries for nature should also be used for peat extraction bringing a **consistent and predictable after-use planning guideline across all extractive industries** ( mining, quarrying and peat extraction)

**Keywords:** peatlands, Biodiversity, amenity, climate, extractive industry, scale, water quality

*Main opinion:*

We welcome the pivot towards valuing and preserving natural assets, landscape and environmental amenities in this Draft County Development Plan. However, we have identified some inconsistencies and discrepancies where the ambition can be better reflected in the policies and actions

*Main requests:*

Chapter 1 : 1.8.1 Overarching Guiding Principles Add new Guiding principle : Protect and enhance natural assets to improve environmental and conservation outcomes and contribute to biodiversity recovery

*Main reasons:*

Under the EU Biodiversity Strategy 2030, EU member States including Ireland are required to designate 30% of their land and marine areas for conservation and biodiversity. The draft Plan actually reflects this guiding principle but it is not explicitly stated in chapter 1

## Amendments to terminology used for consistency and recognition

**Chapter:** Volume 1 - chapters » 4. Resilient Economy & Job Creation

**Topic:** economy, job creation

### 4.24 Peatland Tourism

The development of both the Lullymore Heritage and Discovery Park and the proposed

Umeras Peatlands Park has increased the access and educational value of the vast

peatland network in the county. The uninterrupted expanse and biodiversity of these

areas are a significant attraction. The Council will continue to seek to promote the

existing facilities and their expansion.

The Council supports the longer-term strategic planning for industrial peatland areas,

which should include a comprehensive after-use framework plan for the industrial

peatlands and associated infrastructure including workshops, office buildings and

industrial sites reflecting the current transition from employment based around peat extraction. This has potential for tourism resources, examples of which could include, peatways, bike-hire facilities recreational forestry, wilderness, eco-tourism based on biodiversity and a National Peatlands Heritage Park.

***Amendment : National Peatlands Heritage Park should read National Peatlands Park. For consistency and recognition this term should be used throughout the County Development Plan.***

**RE 0126** Facilitate the development of a tourism resource using cutaway peatlands in conjunction with Bord na Móna and Fáilte Ireland, subject to environmental considerations and nature designations, for example, recreational forestry, outdoor pursuits, peatways on the network of bogs and industrial railways and a designation of a **National Peatlands Heritage Park**.

***Amendment : use the term National Peatlands Park for consistency and recognition***

**RE 0127** Support in conjunction with Offaly County Council, Laois County Council and all other relevant stakeholders such as Bord na Mona, Coillte and the NPWS, any proposal for a new National Peatlands Heritage Park centred in Kildare on Bord Na Mona cutaway bogs in Kildare, Laois

***Amendment : same as RE 0126***

Map on page 43 The Kildare Tourism Map presented on page 43 of Chapter 4 should be updated to include the Church of Oak Distillery outside Monasterevin and the proposed Umeras Peatlands Park as supported in this Draft County Development Plan.

Reason: The Church of Oak Distillery and Umeras Peatlands Park are supported in this County Development Plan and will represent major net tourist attractions in West Kildare associated with the Barrow Blueway and the development of a National Peatlands Park.

**Keywords:** inter-county, tourism, NPWS, Coillte

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## Environmental impacts, tourism impacts, landscape impacts

**Chapter:** Volume 1 - chapters » 7 - Energy & Communications

**Topic:** energy, communication

<b>EC O11</b>	Encourage wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy.
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Amendment : **EC 011** *Consider wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy, the County Wind Energy Strategy and the EU and national target of 30% of land for biodiversity.*

<b>EC O16</b>	Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered, to include for example removal or repositioning of turbines, introducing one black painted rotor blade (to reduce motion smear and reduce incident of collision) or the provision of technologies that help minimize harm to birds and other wildlife.
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Amendment : **EC 016** *Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, as set out in EIA and other relevant legislation. Post- construction bird surveys should be included as a condition of planning for any consented developments to permit before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.*

Reason: While black- painted rotor blade may mitigate collision damage for some species and under some conditions there may be more effective devices available in the future. Wind farm developers should not rely on one mitigation factor alone that may not be effective for the sensitive target species ( e.g. Curlew, Lapwing)

### 7.12.7 Peatlands

Text should include reference to West Kildare Just Transition Plan 2022.

It is the policy of the Council to:

<b>EC P17</b>	Support the preparation of a comprehensive “after use” framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and <i>Insert</i> its potential to further the growth of tourism to the County.
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<b>EC O50</b>	Prioritise the sourcing of E.U. and National funding to support projects which assist the transition of the industrial peatlands and the communities traditionally dependant on them, to sustainable after uses.
<b>EC O51</b>	Support Bord na Mona, <i>Insert</i> the local communities and other key stakeholders in the preparation of a long-term strategic plan for the former industrial peatlands.
<b>EC O52</b>	Support Bord Na Mona (and their company Powergen) with their redevelopment proposals for their headquarters at Newbridge, with a view to Kildare County Council promoting the area as a Green Energy Hub, which focuses on the higher order aspects of the renewable energy industry and a climate action training centre.
<b>EC O53</b>	Support the implementation of the recommendations contained in the National Peatlands Strategy 2015 and any subsequent revisions.
<b>EC O54</b>	<p>Require an Ecological Impact and <i>Insert</i> Landscape Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs).</p> <p>Comment : Environmental Impact Assessments which include ecology and landscape/ visual impacts are mandatory for developments under current Irish law. We agree that this should be signalled in the CDP</p>

## Green infrastructure for biodiversity, eco-tourism and local economy benefits

Chapter: Volume 1 - chapters » 9 - Our Rural Economy

### Background 9.1

Kildare is well positioned.....

***Insert : as a gateway and destination county for the Midland Peatlands , to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity based experience.***

<b>RD O11</b>	Support the implementation of the objectives identified in the County Biodiversity Plan 2009-2014 and any relevant local action plan.
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***Amendment : Support the implementation of the objectives identified in the County Biodiversity Plan ( insert new dates) and the Local Just Transition Plan 2022***

***Reason : the County Biodiversity Plan is out of date.***

<b>RD O20</b>	Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing.
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Amendment : **RD020** Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing ***with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation .***

<b>RD O22</b>	Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates.
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Amendment : Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates ***with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation .***

## **Bogs and Peatlands 9.8**

***Peatlands form a distinctive aspect of Kildare's landscape.....(***

**Insert :**The cessation of peat extraction by BNM provides tangible opportunities for West Kildare as a gateway county to the Midland Peatlands and the West. The potential of a National Peatlands Park and the development of the Blueway can greatly assist a Just transition for communities in the area and lead to successful economic regeneration and a sustainable local economy. The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.

**RD P1**

**REASON:** More specific with peatlands – “peatlands rehabilitation and sustainable peatland related tourism”

**RD 08**

**REASON:** Include more ....continued roll out of the National Broadband Scheme - and initiatives such as the EU Smart Villages Initiative.

**Bogs and Peatlands RD P7**

*To also support sustainable tourism and infrastructure for peatland communities.*

***The reference to the IPCCs is missing with respect to the Peatlands and Climate Action Plan 2030***

**Objectives**

It is an objective of the Council to:

<b>RD O27</b>	Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on promoting biodiversity, <i>insert healthy rivers , improving water quality</i> and and carbon sequestration.
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RD O28	<p>Work with all relevant stakeholders including Bord na Móna to support the sustainable re-use of circa 30-50% of cutaway boglands for economical purposes.</p> <p><b><i>Comment : what does “economical “ mean in this context? Should it be “economic”? If so what economic activity is envisaged as sustainable? Suggest deleting RD028 as any proposed development will be subject to relevant Environmental Impact Assessment . The 30-50 % use is arbitrary and should be consistent with new benchmark proposals for post industrial sites for the extractive industries of elsewhere in the plan where 80% of post industrial extractive sector will be returned to nature and 20% for continued economic use</i></b></p>
RD O29	<p>Support the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway</p>

	<p>bogs, in appropriate locations, subject to relevant environmental assessments.</p> <p><b><i>Comment: Is this 50% of each bog or 50% of the total peatlands area i.e. over 5000ha? This figure is arbitrary and should be revised down or deleted. It is also inconsistent with the policy for other extractive industries as in mines and quarrying.</i></b></p> <p><b><i><u>Alternatively the objective should be qualified by including an objective to conserve the landscape area of continuous boglands such as the Allen-Lullymore Bog group and other areas of continuous bogland. See landscape scale objectives in Ch 13 . Furthermore, wind and solar energy development should be considered actively for areas <u>outside</u> peatlands such as farmland.</u></i></b></p> <p><b><i>Amended RD029: Consider the development of renewable energy (wind and solar) on an area no more than 20% of total peatlands subject to the conservation of landscape scale continuous boglands such as the Allen-Lullymore Bog group .</i></b></p>
RD O30	<p>Support diversification and re-use of buildings previously associated with peat extraction to waste management and resource recovery infrastructure.</p>



<b>RD O31</b>	<p>Investigate the feasibility of the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014.</p> <p><b><i>Amendment : Support the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS, Inland Fisheries, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014 and subsequent reports such as the Local Just Transition Plan for West Kildare .</i></b></p> <p><b><i>Reason : See RE 0127and for consistency across the Plan</i></b></p>
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## Mineral Resources & Extractive Industry

<b>RD O39</b>	<p>Ensure the satisfactory and sensitive re-instatement and/or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands. Proposals for futures uses/infill of these areas should be agreed with the Planning Authority through the development management process.</p>
<b>RD O40</b>	<p>Require that quarry remediation plans provide for a minimum of 80% of the area to be provided for environmental benefit, biodiversity and re- wilding. Where other after-use strategies are proposed (i.e., concrete batching, etc.) that might require more than the 20% in use for ongoing economic purposes, then other lands (including other disused quarries) may be used to compensate any shortfall, either by condition of use, sterilisation/legal agreement, or rehabilitation and transfer to either the Council or an established wildlife group. The 80% requirement for environmental/biodiversity may be waived at sites closer to urban areas where a significant portion of the site is being provided for sports, recreation, and amenity.</p>

***Comment : RD039 and RD 040 This innovative approach to post- industrial site use is welcomed and should be considered as a guiding objective with the 80% benchmark set for all post- industrial sites for the extractive industries including peatlands .***

**Keywords:** post industrial use, extractive industry, peatlands, quarries

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## Peatlands as important recreational amenity

**Chapter:** Volume 1 - chapters » 10 - Community Infrastructure & Creative Places

Chapter 10 Community Infrastructure and Creativity

### Chapter 10 – Community Infrastructure & Creative Spaces

It is the policy of the Council to:

<b>SC P2</b>	Require the delivery of a range of universally accessible and well- connected social, community, cultural, and recreational facilities, close to the communities they serve through the designation and safeguarding of specific land uses at appropriate strategic and optimised locations in settlement plans and mandatory Local Area Plans in County Kildare.
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#### New Objective SC019

**Reason: Potential of peatlands to become an important recreational amenity.**

**SC019**

	<b>Support and encourage community involvement in the rehabilitation, restoration of Bord na Mona peatlands and in the planning for future recreational amenity.</b>
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#### New Action SCA5

	<b>Support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 and objectives in the new County Biodiversity Plan.</b>
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## New Biodiversity Action Plan needed

**Chapter:** Volume 1 - chapters » 12 - Biodiversity & Green Infrastructure

**Topic:** biodiversity

**12.5.3 County Kildare Biodiversity Action Plan 2009-2014** The Council adopted its first Biodiversity Action Plan in April 2009 in accordance with the National Biodiversity Plan. The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan. ***Insert : A new County Kildare Biodiversity Action Plan will be published by 2024***

**Reason;** a central Kildare resource containing biodiversity aims, objectives and initiatives is essential. This document will illustrate the large reach, responsibility and accountability of the Council and partner organisations for biodiversity, healthy rivers, water quality and the protection of nature. This new enhanced objective to reach 27% of land for nature (see ch 13) should provide the cornerstone of the Plan with milestones for the achievement of this target. A published document will help inform the public, ensure implementation and form a tool to keep track of progress

BI A3 Review the County Kildare Biodiversity Plan within the lifetime of this Plan.

***Insert : Publish a new County Kildare Biodiversity Action Plan by 2024***

**BI A7** Identify and map County Biodiversity Sites in cooperation with the relevant statutory agencies, other relevant groups and the general public, not otherwise protected by legislation. **BI A8** Develop Management Plans for County Biodiversity Sites where appropriate. **BI A9** Support the development, where appropriate and feasible, of biodiversity awareness signage in the county. **BI A10** Work with Teagasc and landowners throughout the county in order to identify suitable 'Hare's Corner' projects which would create pocket sized habitats in order to enhance biodiversity

***Insert new Action : Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan and identify areas including Harristown Common and the Allen-Lullymore Bog Group of sufficient scale as Special Amenity Areas under Ministerial Order***

**BI A22** Work with Bord Na Mona to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors (long distance peatways) as identified in Sections 12.14.6, 12.14.7 and 12.14.8, that may inform the designation of an interconnected Bog of Allen Nature Reserve, Special Amenity Area

***Comment: this Action is welcome. The critical importance of scale must be underlined***

**12.14.6.5 Bog of Allen** Bog of Allen this is a very extensive area that extends from Monasterevin, Rathangan, Allenwood and Prosperous in the south northwards to Johnstown Bridge, Moyvalley and Broadford in the north and it extends further west into County Offaly (south of Edenderry). Due to the intensive industrial scale turf cutting operations of Bord Na Mona over the past 70 years, the remnants of intact raised bog habitat throughout its former range has greatly diminished yet there are still a number of important areas such as Ballynafagh Bog (SAC), Ballynafagh Lake (SAC), Carbury Bog (NHA), Hodgestown Bog (NHA), Staplestown Bog (pNHA) and Ballina Bog (pNHA) in addition to a number of smaller 'left over' areas of prime bogland habitat. The area also includes the Lullymore Heritage and Discovery Park, the Irish Peatland Conservation Council (which manages Lodge Bog, a Butterfly Reserve at Lullymore West and that Bog of Allen Nature Centre in Lullymore). Even where intensive scale peat extraction has occurred, many areas are characterised as wetlands, important in regulating water run-off and these and other areas have demonstrated a certain natural resilience and are naturally re-wilding and forming very important habitat in the form of species rich open areas or first generation woodland (scrub-woodland comprised of birch, sally, alder, ***Insert: buckthorn including purging buckhorn*** and pine) that are very rich in species diversity – wildflowers, moths, butterflies, insects, birdlife and mammals.

#### **12.14.6.5 Bog of Allen**

..... A number of proposed long distance peatways that could connect the Royal Canal with the Grand Canal/Barrow Blueway are listed below in Section 12.14.8.8. *It is expected that 50% of the Peatland Area will remain free from any development.* **Delete this sentence. See comments under RD O 28 and RD O 29**

#### **12.14.6.8**

12.14.6.8 Ummeras Bog This area is proposed for a Peatlands National Park, which is supported by the Council

***Amendment:*** Ummeras Bog ***This area is proposed for a Peatlands Park which is supported by the Council and will form part of the National Peatlands Park.,***

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## **Wilderness Experience and importance of landscape scale**

**Chapter:** Volume 1 - chapters » 13 - Landscape, Recreation & Amenity

**Topic:** landscape, recreation, amenity

LR O13	<p>Recognise that cutaway and cut-over boglands represent degraded</p> <p>landscapes and/or brownfield sites and thus are potentially fit to</p> <p>absorb a variety of development provided that the development</p> <p>proposal does not increase Green House Gas emissions</p>
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Amendment : Recognise that ***some*** cutaway and cut-over boglands ***may*** have the characteristics of represent degraded

landscapes and/or brownfield sites and thus ***may*** potentially be fit to

absorb a variety of development provided that the development

proposal does not increase Green House Gas emissions ***or damage protected habitats or species***

LR T1

Endeavour to increase the territory of County Kildare designated to

nature from 3% to 27%- ***30%*** by the end of this Plan period, in response to

the Government's commitment to designate 30% of the territory of

Ireland for nature by 2030 and in accordance with the EU Biodiversity

Strategy 2030. This may can be achieved by the development of the

proposed Midlands Peatlands National Park National Peatlands Park (see objectives in Section13.6).

#### 13.4.4 The River Liffey and the River Barrow Valleys

***Reference to the River Barrow forming part of an SAC should be added to this paragraph for consistency with***

#### 13.4.5 Rye Water Valley at Carton SAC

#### 13.5.2 Views to and from Waterways

### 13.6.2 Forest Parks, Woodlands & Boglands

Approximately 9,200 ha of land in Kildare is under forest cover. Forests and woodlands provide benefits over and above the revenue yielded from timber and other wood-based products. These include recreational and tourism amenities for local communities. Table 13.8 outlines recreational woodlands in the county.

Name	Location	Owner
Donadea Forest Park	Donadea	Coillte
Moore Abbey	Monasterevin	Coillte
Mullaghreelan Wood	Kilkea	Coillte
Rahin	Edenderry	Coillte
Killinthomas Wood	Rathangan	Coillte

**12.5.3 County Kildare Biodiversity Action Plan 2009-2014** The Council adopted its first Biodiversity Action Plan in April 2009 in accordance with the National Biodiversity Plan. The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan. ***Insert : A new County Kildare Biodiversity Action Plan will be published by 2024***

**Reason;** a central Kildare resource containing biodiversity aims, objectives and initiatives is essential. This document will illustrate the large reach, responsibility and accountability of the Council and partner organisations for biodiversity, healthy rivers, water quality and the protection of nature. This new enhanced objective to reach 27% of land for nature (see ch 13) should provide the cornerstone of the Plan with milestones for the achievement of this target. A published document will help inform the public, ensure implementation and form a tool to keep track of progress

***Comment :** The acknowledgement and recognition of the positive contribution of our natural assets is very welcome.*

LR O40	<p>[Investigate the feasibility of developing a ] Amend to read : <b><i>Support and facilitate the development</i></b> of a National Peatlands Park</p> <p>in consultation with Offaly and Laois County Councils, Bord na Móna, Coillte, NPWS, local landowners and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science and eco-tourism potential.</p>
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Reason : for consistency and linkage with RE O127 which states “ Support in conjunction with Offaly County Council, Laois County

Council and all other relevant stakeholders such as Bord na Mona,

Coillte and the NPWS, any proposal for a new National Peatlands

Park centred in Kildare on Bord Na Mona cutaway bogs in

Kildare, Laois”

Insert new action to implement objective in LR040

***LR A 13 Engage with the Department of Housing , Local Government and Heritage and other County Councils and relevant stakeholders to advance the delivery of a new National Peatlands Park ( see EC A7)***

### 13.3 Landscape Character Assessment

Actions

It shall be an action of the Council to:

LR A1	Review and update the County Landscape Character Assessment, within two years of the adoption of this Plan <sup>1</sup> , having regard to the European Landscape Convention Florence 2000, in accordance with all relevant legislation and guidance documents and to ensure consistency with the forthcoming National and Regional Landscape Character Assessment. All landscape character designations will be fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich areas.
LR A2	Investigate the feasibility of preparing a Historic Landscape Characterisation of the county.
LR A3	Plant gateway roundabouts within the county with innovative design themes, having regard to traffic safety.

**Amendment : Revalue West Kildare Bogs to Class 5 and postpone decisions which would impact the landscape until an updated County Landscape Character assessment is completed. This would ensure the Bog of Allen's potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period.**

**Reason:** The original LCA was undertaken in 2004 and undervalues the Bog of Allen historical, cultural, religious and environmental importance. It also fails to reflect the significant rehabilitation and scientific research carried out in many of these peatlands and the growth of both domestic and international tourism to West Kildare over the past 18 years. It is also now widely accepted that Irelands raised bogs have global significance as a carbon store and ecosystem treasures and that their protection and rehabilitation is the first line of defence in mitigating climate change and protecting biodiversity.

**Amendment : Recognize the importance of the nationally-important greenways and blueways as presented in the Green Infrastructure Concept map and identify important clusters of core areas/nodes/stepping stones which can have strengthened landscape protections in recognition of their importance of peatlands nature/tourism hubs as identified in the Barrow Blueway Economic Plan, the West Kildare Just Transition Plan and the Kildare Tourism Strategy.**

**Reason:** The existing Landscape Character Map was prepared in 2004 and fails to take into account significant new developments in County Kildare including:

- Significant peatlands in the landscape – in 2004 the peatlands of Kildare were largely considered as industrial



production areas but since the cessation of peat harvesting in 2020 these areas have emerged as a major new opportunity for the development of biodiversity areas to meet the new 27% protected area target and the proposal for a National Peatlands Park on the Ballydermot Bog complex and a Peatlands Park on Umeras Bog which are recognized as core areas in this draft County Development Plan (section 12.14.5)

- The construction of the 5th national blueway – the Barrow Blueway and the development in this County Development Plan of a new Green Infrastructure Map which recognizes the importance of Green and Blue corridors joining the core areas and nodes/stepping stones in the county.
- The peatlands nature tourism opportunities identified in the West Kildare Just Transition Plan, the Barrow Blueway Economic Plan and the Kildare Tourism Strategy.

***Change: The current Matrix for the Impact of Development on Landscape is based on impacts in 2004 and is outdated and the landscape impacts on the core/nodes/corridors in the Kildare County Council's Green Infrastructure Strategy need to be revised before the Wind Energy Strategy is adopted and impacts considered within 2000m of Landscape Sensitivity Areas.***

Reason: The current Matrix for Impact on Development on Landscape is only based on a distance of 300m from significant Green infrastructure. This was based on a 2004 Landscape Character Assessment when wind turbines were only 50m in height. Given that turbines are being proposed in County Kildare which are 220m high it makes no sense to only consider a 300m distance from corridors/nodes and core areas and a distance of 2000m would be considered reasonable in relation to the height of turbines.

34	Views of the Bog of Allen <b><i>(including the Allen-Lullymore Bog group)</i></b> and the Hills of Allen, Grange and Dunmurry along the	Allenwood middle,  Allenwood south, Lullymore
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R403 and R414 from Allenwood to Rathangan.	East, Lullymore West,  Barnaran, Drumsru,  Cappanargid, Killyguire and  Newtown.
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**Change: The inclusion of the Allen Lullymore Bog Group is important as this is the view looking westward from Lullymore which is an established peatland tourism hub in West Kildare.**

**Reason: The panoramic and uninterrupted views across the Bog of Allen to the west are celebrated and promoted internationally by Lullymore Heritage & Discovery Park (which attracted over 54000 fee paying visitors in 2019) and the IPCC.**

## Objectives

It is an objective of the Council to:

LR O37	Promote and enhance public access for all7 to the upland areas, rivers, lakes and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies, while protecting environmental sensitivities and ecological corridors.
LR O38	Ensure the biodiversity value of all sites are considered and protected in the development of outdoor recreational facilities including greenways through the preparation of an Ecological Impact Assessment which shall guide the location and design of such facilities.
LR O39	Support Coillte, Bord na Mona, Waterways Ireland and other state agencies to explore the provision of more recreational infrastructure at appropriate locations to include access ways and nature trails with a view to opening up state lands for recreational use.
LR O40	<b><i>Amendment : Work to develop</i></b> (delete: Investigate the feasibility of developing) a Peatlands National Park in consultation with Offaly County Council, Bord na Móna, Coillte, NPWS, local landowners and all other relevant stakeholders to include areas of (inter alia) high nature value, amenity, education/science and eco-tourism potential.

LR O41	<p>Support the proposed Umeras Peatlands Park development of Umeras Community Development and explore links between the bog and nearby blueways and greenways, whilst ensuring nearby properties would not be negatively affected, in consultation with Offaly County Council, Waterways Ireland and all other relevant stakeholders.</p>
LR O42	<p>Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders. <u><b>The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.</b></u></p>


## Just Transition

**Chapter:** Appendices

Please add the Local JustTransition Plan for West Kildare , 2022 to the list of ducuments in the appendix

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**Documents Attached:** No

**Boundaries Captured on Map:** No