



**Uimhir Thagarta Uathúil:** KCC-C55-470

**Stádas:** Submitted

**Aighneacht:**

IPCC Comments on draft County Development Plan 2022

**Údar:** Irish Peatland Conservation Council

**Comhairliúchán:**

Draft Kildare County Development Plan 2023 - 2029

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## Litir Chumhdaigh

The Irish Peatland Conservation Council's mission to conserve a representative sample of Irish peatlands for present and future generations to enjoy and benefit from their ecosystem services.

### Tuairimí:

#### 1.3 Profile of County Kildare

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

**Ábhair:** 1. Introduction

This section should also describe the habitats and landscape character of County Kildare. County Kildare once had 24,317ha of peatland but due to the industrial extraction and economic development of the County this has been reduced to 2981ha (Peatlands and Climate Change Action Plan 2030, IPCC, 2021) of peatland that is in a conservation worthy condition. Including this within the plan highlights that peatland should be regarded as an important natural feature and that the benefits in terms of biodiversity, carbon storage/protection and water regulation are at the forefront of the County's climate change and biodiversity emergency reversal agenda.

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#### 1.4.1 Contents of Development Plans: Planning and Development Act 2000 (as amended)

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

**Ábhair:** 1. Introduction

The list in this section should also include....

"The establishment of a National Peatlands Park in County Kildare will bolster conservation efforts, reduce GHG emissions, draw visitors to the county utilising the Greenways and Blueways which are currently in development and provide an environmental tone linking businesses and amenities which fortify the planning and development agenda".

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## 1.4.2 Project Ireland 2040: National Planning Framework (NPF)

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

**Ábhair:** 1. Introduction

Section 1.4.2 should highlight that by developing a National Peatlands Park the Government's National Planning Framework will be supported and the National Strategic Outcomes will be recognised. A National Peatland Park would be a focal point for integrating all NSOs within the County of Kildare.

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## 1.4.3 Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

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

**Ábhair:** 1. Introduction

This section should include that "The development of a National Peatlands Park will support all three key aims of the RSES".

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## 1.5 Climate Change

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

**Ábhair:** 1. Introduction

Peatlands once accounted for 14.3% of the landscape of County Kildare but the majority of Irish peatlands have been converted to other uses such as industrial peatland, agricultural land, afforested and cutover peatland. These are emitting greenhouse gases and contributing to climate change. The climate crisis means that land managers and individuals need to work together from all sectors to not only restore the carbon sequestration function in peatlands but to protect the carbon stocks in peatland and prevent further degradation. Without restoration of the hydrological and ecological functioning of peatlands climate change itself will accelerate further loss of peatland sites. As the emissions from damaged peatlands and the carbon savings from peatland restoration are eligible for national carbon accounting under the UN Framework Convention on Climate change there is an opportunity for Ireland to include peatland restoration and rewetting in the national climate action plans. County Kildare should also seriously look at the opportunity that has arisen from the end of industrial peat extraction which is leaving a large land bank available for conservation at a landscape scale which has to this time been un-available and a serious hinderence to proper conservation. The development of a National Peatlands Park would bolster and improve County Kildare's efforts in combatting climate change and strengthen all it's efforts in reversing biodiversity loss.

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## 1.6 Sustainable Development Goals

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

**Ábhair:** 1. Introduction

Please include in this section "All the Sustainable Development Goals will be supported by the rehabilitation of the peatland within the County and the development of a National Peatlands Park which is a sustainable and integrated use of this natural resource".

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## 1.8.1 Overarching Guiding Principles

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

**Ábhair:** 1. Introduction

Many of the guiding principles will be supported by the development of a National Peatland Park and this should be highlighted within this section. (changes in **bold**)

(i) To develop a county that is resilient to climate change, plans for and adapts to climate change and flood risk, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy. **This principle is supported by the creation of a National Peatlands Park.**

(vii) To recognise the role of the rural countryside in supporting the rural economy and its role as a key resource for **education**, agriculture, equine, bloodstock, forestry, energy production, tourism, recreation, mineral extraction and rural based enterprises, **such as the creation of a National Peatlands Park.**

(viii) To support, facilitate and promote the sustainable development of renewable energy sources in the county **without hindering conservation at a landscape scale.** (All developments, including renewable, need to be sensitive to the environment and biodiversity and should not hinder conservation at a landscape scale which Ireland is currently lacking).

(ix) To protect local assets by preserving the quality of the landscape, open space, recreational resources, natural, architectural, archaeological and cultural heritage and the material assets of the county. **This will be supported by the creation of a National Peatlands Park.**

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## 2.6 Compact Growth and Climate Action

**Caibidil:** Volume 1 - chapters » 2. Core Strategy

**Ábhair:** Core Strategy

Please include at the end of the section.....**"These actions go hand in hand with the re-appreciation and rehabilitation of peatland and it's ecosystem services. The creation of a National Peatlands Park will further improve the intergration of low carbon living and strengthen the climate change mitigation actions by providing tourism oportunities, educational outreach and amenity".**

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## Core Strategy and Settlement Strategy

**Caibidil:** Volume 1 - chapters » 2. Core Strategy

**Ábhair:** Core Strategy

CSO 1.2 Ensure that the future growth and spatial development of County Kildare provides for a county that is resilient to climate change, enables the decarbonisation of the county's economy and reduces the county's carbon footprint in support of national targets for climate mitigation and adaption objectives as well as targets for greenhouse gas emissions reductions. **The creation of a National Peatlands Park will further enable the county to climate change proof the landscape while providing for biodiversity and greenhouse gas emission reductions.**

CSO 1.7 Promote and facilitate the development of sustainable and socially integrated communities through land use planning, by providing for land uses capable of accommodating employment, **environmental education**, community, leisure, recreational and cultural facilities having regard to the quality of the environment, landscape character and the archaeological and architectural heritage. **The intergration of the county's peatlands into a National Peatlands Park will also promote their ecosystem benefits, protect and store carbon and provide for biodiversity while highlighting sustainable living.**

CSO 1.8 Support the implementation of Kildare's Climate Change Adaptation Plan in conjunction with all relevant stakeholders **including the creation of a National Peatlands Park to support all climate change adaptations, biodiversity recovery, Sustainable Development Goals and the National Planning Framework.**

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## 4. Resilient Economy & Job Creation

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

**Ábhair:** job  
economy, creation

### 4.17 Green / Circular Bio-economy

The development of the green and circular bio-economy is a must if Count Kildare is to reduce it's peat usage in horticulture and agriculture which in turn will reduce pressure on peatland within the County. The green and brown wastes from industrial/landcaping and food sectors needs to be incorporated into the circular economy to create sustainable peat replacements. This will lower greenhouse gas emmisions from degraded peatland and help the County move away from using a finite resource (peat) which the removal from the environment is also a direct loss of biodiversity. The County Council also need to explore all the other industrial wastes and outputs and fund research into their suitability as to whether they can also be incorporated into the green and cirular economy.

Please include in this section **"The green and circular economy agenda will also reduce the use of peat within horticulture and agriculture which will reduce pressure on the environment and lower greenhouse gases, improving the situation for biodiversity and moving us in a direction of sustainable production".**

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## 4. Resilient Economy & Job Creation

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

**Ábhair:** job  
economy, creation

### 4.24 Peatland Tourism

The end of industrial extraction of peat within the County has heralded a new opportunity to reverse the biodiversity loss and greenhouse gas emissions emanating from the large expanses of brownfield sites. The benefit from the rehabilitation and restoration of these areas in terms of conservation and ecosystem services can not be understated. Coupled with the development of the blueways and greenways, creating a corridor for tourism the peatlands of County Kildare can be the gateway for the midlands bringing international and domestic visitors. If sensitive to the receiving environment there is a chance for a sustainable tourism economy, creating jobs and supporting the indigenous population who also benefit from the local environmental amenity.

The IPCC support the creation of **National Peatlands Park** (please change from **National Peatlands Heritage Park**) which celebrates the close connection of the people and peatlands but heralds a new appreciation of the globally unique peatland habitats.

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## 4. Resilient Economy & Job Creation

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

**Ábhair:** job  
economy, creation

(Changes in **Bold..removal** of the word **Heritage** for consistency)

### RE O126

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 Park**.

### RE O127

Support in conjunction with Offaly County Council, Laois County Council and all other relevant stakeholders such as Bord na Mona, Coillte, NPWS and other relevant stakeholders such as environmental Non-Governmental Organisations, any proposal for a new **National Peatlands Park** centred in Kildare on Bord Na Mona cutaway bogs **incorporating the wider biodiversity hotspots, increasing recognition of the wider peatland landscape** within Kildare, Laois and Offaly.

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## 6. Infrastructure & Environmental Services

**Caibidil:** Volume 1 - chapters » 6. Infrastructure & Environmental Services

**Ábhair:** environment

### IN O32

Recognise the important role of natural boglands and other wetland areas in flooding patterns. Development in these areas shall therefore be subject to a Flood Risk Assessment in accordance with the relevant guidelines.

Please explain "natural" boglands, there is very few intact raised bogs left and these should never be developed. This action should be further expanded to include all peatland, as the rehabilitation of which will improve flood retention and water quality. The Council should strive to rehabilitate and restore as much peatland as possible if climate change mitigation and flood relief is really on the agenda. The IPCC suggest the removal of the word "natural".

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## 7 - Energy & Communications

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

**Ábhair:** energy

### EC O2

Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts and impacts on protected or designated heritage areas / structures.

There are many other biodiversity hotspots which are not designated and these also need to be protected from developments. Sites listed within the Bog of Allen Heritage Survey or Kildare Wetland Survey should also be incorporated and recognised within any development.

Please ammend to "Adopt an informed and positive approach to renewable energy proposals, having regard to the proper planning and sustainable development of the area, including community, environmental and landscape impacts and impacts on protected or designated heritage areas / structures. **Protecting biodiversity and conservation of un-designated sites is also a priority**".

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## 7 - Energy & Communications

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

**Ábhair:** energy

### EC O11

Encourage wind energy developments in suitable locations in an environ- mentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy.

Please ammend to...

"Encourage wind energy developments in suitable locations in an environ- mentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy **while being sensitive to the EU and national target of 30% of land for biodiveristy**"

The rush for renewable energy has fragmented rare and unique blanket bog habitat and this should not happen to the conservation potential of the brownfield sites which have come out of industrial production within the County.

The renewable energy agenda should be sensitive to biodiversity and conservation.

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## 7 - Energy & Communications

Caibidil: Volume 1 - chapters » 7 - Energy & Communications

Ábhair: energy

Please ammend to....

### "EC O16

Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites **in accordance with EIA, EU Habitats and Species Directives and all other relevant environmental legislation** so that impacts on wildlife can be fully assessed and evaluated and so that appropriate 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."

PLease remove the word "mitigation" (as above) as mitigation should not be an option. This is developers deceiding where conservation happens rather than scientific consensus.

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## 7 - Energy & Communications

Caibidil: Volume 1 - chapters » 7 - Energy & Communications

Ábhair: energy

### 7.12.7 Peatlands

#### EC P17

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 **including the creation of a National Peatlands Park, being a focal point for the environmental landscape, conservation and amenity.**

#### EC O53

Support the implementation of the recommendations contained in the National Peatlands Strategy 2015 and any subsequent revisions **including the creation of a National Peatlands Park and Peatland Centre of Excellence**

County Kildare has huge potential in conservation and biodiversity and the end of industrial extraction puts forward a new agenda in terms of economic sustainability, County Kildare should seize the oportunity to engage with stakeholders and develop a new Peatland Centre of Excellence as set out in the National Peatland Strategy. The County already has many environmental educational facilities which could support this, such as the Bog of Allen Nature Centre and Lullymore Heritage and Discovery Centre but this needs to be first realised in policy and joined up thinking.

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## 7 - Energy & Communications

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

**Ábhair:** energy

EC O55

Estimate an overall carbon balance when evaluating renewable energy project applications on peatlands, especially those proposed for wind or solar projects **taking into account the lifetime of the project versus the potential carbon sequestration over 1000s of years of a site once rehabilitated fully.**

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## 8 - Urban Centres & Retail

**Caibidil:** Volume 1 - chapters » 8 - Urban Centres & Retail

### 8.2.4 Kildare 2025 Economic Development Strategy

Please include.....

This strategy outlines 5 Strategic Objectives for the Plan, which include:

1. Strengthen the resilience of our retail sector to rebuild stronger and greener
2. Facilitate and support the retail offering's expansion and sustainment in County Kildare.
3. Measures to revitalise town centres.
4. Explore new opportunities in the circular economy for our retail businesses
5. Enable retailers to adopt online business models.

**6. Provide branding, identity and linkage opportunities by creating a National Peatlands Park brand incorporating the peatland landscape character into the economic and retail sector.**

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## 9 - Our Rural Economy

**Caibidil:** Volume 1 - chapters » 9 - Our Rural Economy

County Kildare is home to a vast array of peatland types which need recognition in terms of their biodiversity, conservation and natural history. The County should use this resource sensitively and promote all the tourism opportunities possible.

Please amend the following paragraph....

"The agri-food, forestry, and tourism sectors play a significant role in Ireland's rural economy. Kildare is well positioned to contribute more to the tourism sector with the development of a **National Peatlands Park being a focal point for the** greenways, blueways, and peatways providing an alternative **eco-tourism** visitor experience **celebrating the recovering biodiversity**".

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## 9 - Our Rural Economy

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

Please ammend.....

Peatlands form a distinctive aspect of Kildare's Landscape. They represent some of the counties last areas of wilderness. The former Bog of Allen is the largest raised peat bog in Ireland. At over 950 square kilometres, it spreads across nine counties, including Kildare, and is the source of the River Boyne. Contained within this bogland in Kildare are a number of protected sites, the former boglands of Bord Na Móna and a number of visitor attraction centres around the bogland heritage such as Lullymore. **There are also many sites that are not protected that will be recognised within the plan, such as the sites listed within the Bog of Allen Heritage Survey and the Kildare Wetland Survey. With the end of industrial peat extraction the CDP will move forward with the creation of a National Peatlands Park linking them with environmental corridors. This will bolster tourism oportunities while being sensitive to the needs of biodiversity and conservation. This will offer visitors a unique experience and provide a gateway to the peatlands of the midlands.** The National Peatland Strategy 2014 which set targets for the re-use of cutaway bogs in terms of environmental protection, forestry, energy production and recognises the importance of this peatland landscape and promotes the concept of a National Peatland Park to explore the rich natural, archaeological, and cultural heritage of this unique landscape.

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## 9 - Our Rural Economy

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

Please change wording....

RD O27

Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on **maximising** biodiversity and carbon sequestration.

Climate change, as the BOGLAND Report shows (EPA, 2011) that unless peatland is rehabilitated/restored correctly they will not withstand the climatic changes we are facing. The sites not fully rehabbilitated will revert back to carbon sources as we feel the dryer summer and wetter winters. We need to maximise the biodiversity and climate change mitigation potential of peatlands.

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## 9 - Our Rural Economy

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

This section should be removed as "economimcal purposes" is too vague. How does this tie in with the 30% of land for biodiversity and conservation as highlighted elsewhere in the plan?

RD O28

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.

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## 9 - Our Rural Economy

**Caibidil:** Volume 1 - chapters» 9 - Our Rural Economy

Please ammend.....

RD O31

Investigate the feasibility of the development of a **National Peatlands Park** in co-operation with Bord Na Mona, NPWS, **Environmental Non-Governmental Organisation, 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.

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## 12 - Biodiversity & Green Infrastructure

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

**Ábhair:** green infrastructure

**BIO3**

The Council should consider that the protection of all wetlands identified within the Kildare Wetland Survey should be a priority. In particular boglands within the county have been reduced to just 12% of conservation worthy sites from the original extent of peatland and theses should be a priority for protection and carbon storage.

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## 12 - Biodiversity & Green Infrastructure

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

**Ábhair:** biodiversity

**12.14.6.5**

**Bog of Allen**

Please remove

"It is expected that 50% of the Peatland Area will remain free from any development".

What impact will economical development have on the 50% not developed, the footprint of renewable energy goes further than the the blade length, the hydrological impacts and fragmentation also have implications on biodiversity. This is not inline with the limits proposed in other areas of this plan.

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## 12 - Biodiversity & Green Infrastructure

**Caibidil:** Volume 1 - chapters» 12 - Biodiversity & Green

Infrastructure

Ábhair: green  
biodiversity, infrastructure

#### 12.14.6.8

Ummeras Bog

This area is proposed for a Peatlands National Park **which will form part of the wider National Peatlands Park**, which is supported by the Council.

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### 13 - Landscape, Recreation & Amenity

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

Ábhair: landscape

#### LR O13

Recognise that **some** cutaway and cut-over boglands represent degraded landscapes and/or brown??eld sites **that may have the potential** to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions or impact on **biodiversity and conservation**.

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### 13 - Landscape, Recreation & Amenity

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

Ábhair: landscape

#### LR T1

Endeavour to increase the territory of County Kildare designated to nature from 3% to **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 **National Peatlands Park**.

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Documents Attached: Níl

Teorainneacha Gafa ar an léarscáil: Níl