



**Uimhir Thagarta Uathúil:** KCC-C55-172

**Údar:** Umeras Community Development

**Stádas:** Submitted

**Aighneacht:**

Submission from Umeras Community Development CLG  
(UCDCLG) on 2023-2027 Kildare Draft County Development Plan

**Comhairliúchán:**

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Draft Kildare County Development Plan 2023 - 2029

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## Comments on Energy Strategy

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

**Ábhair:** energy

### Chapter 7: Energy & Communications

Comments:

The proposed Wind Energy Strategy that accompanies the Draft County Development Plan is based on significantly outdated information and is not consistent with Chapter 7 on Biodiversity & Green Infrastructure or Chapter 13 on Landscape, Recreation & Amenity.

The Landscape Assessment underpinning the Wind Energy Strategy Dates from 2004 and is therefore completely outdated and not relevant. An up-to-date Landscape Assessment should be part of any Strategic Environmental Assessment or Wind Energy Strategy and without this the strategy is based on outdated information and planning. In addition, the Wind Energy Strategy is based on the Draft 2019 Wind Energy Guidelines which have not come into force and the strategy is premature in adopting this approach.

Main Request:

**Change: The Wind Energy Strategy needs to be re-developed again from first principles to account for the major policy changes and strategies proposed in this draft County Development Plan. The new Green Infrastructure Core-Nodes-Corridor approach in Chapter 12 in the Green Infrastructure Corridor Map needs to inform landscape protections for the 5th National Blueway and the development of new tourism hubs associated with the Blueway, particularly Umeras Peatlands Park/Church of Oak and the Peatlands National Park/Lullymore Heritage Park hubs.**

**Change: 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.**

**Change: The Wind Energy Strategy needs to recognize recent decisions by Kildare County Council and An Bord Pleanala in rejecting the Ummeras Wind Farm due to aviation impacts. The area of this rejected wind farm should be designed as 'not permitted' on the wind farm map to be consistent with the planning decisions and policy of Kildare County Council and the decision by An Bord Pleanala to recognize that wind farms cannot be permitted in this area due to aviation impacts adjacent to the M7.**

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.

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**Documents Attached:** Níl