



Uimhir Thagarta Uathúil: KCC-C55-280

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Stádas: Submitted

Aighneacht:

WildKildare Submission on CDP (Biodiversity, Peatlands Park and Wind Energy Mapping)

Comhairliúchán:

Dáta a cuireadh isteach: 23.05.2022 - 16:23

Draft Kildare County Development Plan 2023 - 2029

Wildkildare comments and concerns relating to Peatland Park Proposal and Wind Farm mapping in Chapter 12

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

Ábhair: green
biodiversity, infrastructure

Chapter 12: Wild Kildare welcomes the references to key EU Directives and AAs. **12.4** mentions the EU Biodiversity Strategy and 2030 goals of which 30% of land set aside for nature is the most important. In that context the Peatland Park vision will be key to achieving such measures. Good to see reference to Aarhus Directive too given the current governments plans to weaken citizen rights in this area despite having been repeatedly warned by the EU about the roadblocks and costs to citizens seeking their environmental rights in the planning sphere etc.

12.5.3 WildKildare consider key actions here to be *BI A1*, *BI A2* and *BI A3*

12.8 Policy on County Biodiversity Sites chimes with PPark aims, notably *BI P5*

12.14.4 Green infrastructure: *BI A22* directly mentions Peatland Park and BNM role in its establishment. Includes reference to "Core Areas" to achieve this ie. off limits to windfarms presumably ??

Concerns **12.6** Discusses the Nature Network, but are policy actions like *BI P2*, *BI O5* and *BI O7* reflected in the Appendix 2 Wind Farm Sensitivity Map?? Don't appear to be!!

12.7 Protected Habitats and Species outside of Designated Sites. This is obviously extremely important regarding Peatland Park aims and the shortcoming of current Wind Energy Land Zoning within the CDP. Key policies here include *BI P4*, *BI O10*, *BI O13* in sec **12.7.1** in terms of windfarm planning

12.11 Emphasises the importance of wetland sites that are undesignated but important for Annex 1 species and Habitats. Again this needs to be reflected better in KCC proposed windfarm location guidelines. Sites of importance mentioned in **Table 12.5**. “Highly Rated” Sites of relevance include Barrow Canal, Lodge Bog, Lullybeg(BCI Reserve), Lullymore West, Grand Canal, Ballydermot, Bog Allen Nature Reserve, North of Heritage Park, Lullymore Cutaway, Killinthomas Wood,

12.14.6.5 Gets deeper into these “Core Areas” mentioned above in terms of the Bog of Allen and the high biodiversity of recovering cut over peatlands in the Ballydermot complex. Mentions nature based carbon storage too but also BNM intentions in terms of Wind Farms within the same complex – obviously this is problematic given BNM current Ballydermot Windfarm design and conflicts with “Core Area” protection aims. Thankfully though it mentions a large area of key sites within the Ballydermot that are “Core Areas” incl Lullybeg Wetlands, Heritage Park, Lodge Bog etc. and nearby Canal Corridors. However this is undermined by the last sentence which states that only “50%” of the Peatland Area will remain “free from any development” – obviously this last sentence **needs removal!!** Outside of the Ballydermot complex Kilberry, Narrghmore and Umeras bogs mentioned in the same context. Again though 50% figure is stated which is obviously problematic in terms of aims of Peatland Park and would be no doubt “exploited” by BNM in terms of its aggressive windfarm plans in the area!!

12.14.8 Discusses major Green Corridors like Grand/Royal Canal, River Barrow etc. but again this clashes with lack of windfarm planning set backs in Appendix 2 for these same areas!!

12.14.8.8 Peatways – Mentions more substantial set backs here of 1000m but these are still inadequate given the current scale and size of wind turbines. Goes on to outline where these Peatways are to be located which matches up with Peatland Park proposals

Documents Attached: Níl