



**Uimhir Thagarta Uathúil:** KCC-C55-421

**Údar:** Bord na Móna

**Stádas:** Submitted

**Aighneacht:**

Bord na Móna submission\_Future Use of the Peatlands

**Comhairliúchán:**

Draft Kildare County Development Plan 2023 - 2029

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## Litir Chumhdaigh

Dear Sir/Madame,

Bord na Móna welcomes the opportunity to contribute to the draft Kildare County Development Plan.

Bord na Móna's longstanding mandate is to strengthen Ireland's security of energy supply, and by doing so, help support the economic development of its area of operations. This mandate has delivered numerous significant socio-economic benefits across Ireland and provides the basis for the company's land use priorities.

In the context of national policy objectives designed to deal with the climate emergency, Bord na Móna now supports Ireland's security of energy supply by delivering key national renewable energy and sustainable economy objectives. In line with the company's climate solutions focus, Bord na Móna has also broadened the scope of the socio-economic and other benefits that are supported by its pursuit of these key policy objectives. The company's land use priorities are summarised as follows:

- Development of renewable energy infrastructure including energy storage technologies, and greenhouse gas emission reduction initiatives.
- Support the just transition away from fossil fuels in the Midlands and contribute towards Ireland's security of energy supply while also realising key climate action objectives.
- Support of key circular economy objectives through the provision of services and infrastructure for resource recovery, reuse and recycling.
- Delivery of national and European climate action objectives, optimising the carbon storage and sequestration potential of the lands where appropriate .
- Support of key national and European biodiversity targets.
- Enabling sustainable socio-economic, commercial, tourism and amenity development that compliments and aligns with the four aforementioned priorities.

Bord na Móna has played, continues to play and has the potential to play a significant role in the economic development of the County. With the unique nature of our landholding, industrial, remote and with access to key infrastructure; opportunities exist to support industries that require scale which is not readily achievable elsewhere in the country let alone the county. The draft Kildare CDP must acknowledge all the Bord na Móna facilities within the county of Kildare that continue to provide socio-economic benefits.

In our submission we have outlined some areas within the document that require further comment and clarification from Kildare Council and additional commentary from Bord na Móna.

Kind Regards,

Conor English

Land Use Manager

## Tuairimí:

### Transitioning to a low carbon economy

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

**Ábhair:** job  
economy, creation

With regard to Section 4 Page 35 (4.24 Peatland Tourism)

Bord na Móna demonstrates the real benefits that can be realised through transitioning to a low carbon economy. While it is recognised that amenity and tourism can have economic benefits for the county through employment it must also be recognised that County Kildare has benefited from Bord na Móna's transition in a number of ways.

The company can confirm that as it has grown its sustainable business in the areas of recycling, renewable energy development and peatland rehabilitation, there has been a limited change in the numbers employed by Bord na Móna in Kildare. Employment figures bear this out with approximately 450 employed in the county in 2018, before the Brown to Green strategy was adopted and these jobs were in the majority related to non-peat harvesting activities, and ranged across the circular economy (Drehid, Siliot Hill, and the green composting facility in Kilberry), renewable energy development and back office support for these activities. With the exception of the reduction of employees in peat harvesting, we have roughly the same number employed in the company in Kildare in 2021 (circa 380 employees) across renewables, recycling and back office. This does not account for additional jobs that will materialise from renewable energy development (and associated amenity) such as the proposed windfarm in Ballydermot and consented solar farm in Timahoe North.

As part of the land transition programme, Bord na Móna is continually reviewing its property strategy to determine future industrial uses for the holdings. Whilst buildings such as workshops and stores comprise a small portion of the holding, these buildings present opportunities for the re-purposing of these facilities for new sustainable industries. The company has repurposed its former briquette production facility in Littleton in County Tipperary as a plastics recycling facility supporting 40 new jobs. Similar opportunities will exist for more of our facilities and in this regard benefitting the economy resulting in employment in the region.

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### Bord na Móna future land uses\_peatland tourism

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

**Ábhair:** job  
economy, creation

Section 4 Page 35 - 4.24 Peatland Tourism

With respect to the following CDP objectives:

- 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 Heritage Park
- RE O127 : 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 and Offaly

*With respect to the objectives RE O126*

Improving biodiversity and the development of amenities are key aspects of the company's vision for the future. Much of the work on peatland rehabilitation will help the company meet important objectives concerning the improvement of habitats for native plants and animals on its peatlands. Work on this scheme will also develop amenity potential, while the development of renewable energy assets will also create a considerable network of new tracks and amenity trails through the Bord na Móna estate. All of these developments will help us create, green, biodiverse corridors through our lands that have hitherto been off limits to our neighbours and communities.

**It is important to recognise given Bord na Móna's mandated climate action solutions, future climate action projects and renewable energy developments are considered a precursor to the development of amenity and to land use plans.**

*With respect to the objective RE O127*

Bord na Móna note the inclusion of Objective RE O127 [in addition to Action EC A7 in Chapter 7] with respect to proposals for a New National Peatlands Park on Bord na Móna cutaway bogs in Kildare, Laois and Offaly. Bord na Móna are happy to support the development of peatlands park and to engage with the relevant stakeholders as required where proposals are compatible with our integrated land-use strategy (such as renewables, industrial, forestry, biodiversity and ecosystem services, amenity and tourism), which supports other national and regional policies and maximises the overall potential of the land-bank.

The Bord na Móna land bank provides a unique opportunity to develop a range of beneficial commercial, environmental and social uses across the midlands. It is important however to note that in every instance, future climate action projects and renewable energy developments are considered a precursor to the development of amenity and to land use plans.

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## **Support Bord na Móna in preparation of our long term strategic plan**

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

Ábhair: energy

### **7.12.7 Peatlands**

The CDP includes the following objectives:

- EC O51 Support Bord na Mona in the preparation of a long-term strategic plan for the former industrial peatlands.
- EC O56 Support the implementation of the 'Local Just Transition Plan for West Kildare' which identifies actions to support and advance sustainable, social, economic, environmental development in the transition to a low carbon future in the West Kildare region.

The Draft CDP lists a number of objectives and specific projects that can be undertaken in County Kildare to help achieve a low carbon climate resilient and environmentally sustainable economy. Some of these objectives are aligned with the objectives of the 'Strategic Framework for the Future Use of Peatlands'[1] document and our ongoing transition to diversify into new sustainable business areas in order to strengthen the company and support jobs in the midlands into the future.

Central to this sustainable transition is the use of Bord na Móna's land bank for a range of beneficial commercial, environmental and social uses such as renewable energy, industrial uses (including but not limited to data centres), biomass cultivation, ecosystem services and biodiversity as well as recreation and tourism. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located.

[1] Bord na Móna Strategic Framework - Future Use of the Peatlands is under review and to be published in 2022

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## Energy Supply

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

**Ábhair:** energy

### 7.13.1 Data Centres & Energy Supply

The draft CDP states the following:

- EC P18 Support the accommodation of Data Centres at appropriate locations in line with the objectives of the National Planning Framework and the Government Statement on the Role of Data Centres in Ireland subject to appropriate Transport and Environmental Impact Assessments

Bord na Móna welcomes this Policy and as part of the land transition programme, Bord na Móna is continually reviewing its property strategy to determine future industrial uses for the holdings. Whilst buildings such as workshops and stores comprise a small portion of the holding, these buildings present opportunities for the repurposing of these facilities for new sustainable industries. The company has repurposed its former briquette production facility in Littleton in County Tipperary as a plastics recycling facility supporting 40 new jobs. Opportunities will exist for more of our facilities and in this regard.

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## Request for clarification\_peatland development

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

**Ábhair:** biodiversity

On Page Pg.38 of the Draft CDP it states:

- *"...This masterplan should, at a minimum, include the following 'core areas' – one should centre around Lullymore Heritage Park, Lullybeg Wetlands, Butterfly Reserve, Lodge Bog – with an extensive buffer zone; a second core area would focus on Ballynafagh Bog, Ballynafagh Lake and Hodgestown Bog; a third area would focus on Killinthomas Wood (Coillte owned), Ballydermot Bog East; a fourth would focus on Ummeras. Each of these would be connected either through the Grand Canal Greenway or the Barrow Blueway/Slate River and/or new and broad Peatway Corridors (the Connectors) and elsewhere there will be other 'stepping stones' in the form of key wetlands, intact raised bogs, woodlands, etc. 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."*

Bord na Móna respectfully request further information about this paragraph in particular the last sentence which states that a % of the peatlands which will remain free from any development. This could be interpreted in many different ways and it is not clear what the council means by the term "development". This statement could read that the council may also be constraining amenity or any other land use. A Local Authority or any government body cannot constrain bogs from future land use/developments in this manner and at such a high level. Constraining out lands like all developments undergo rigorous assessment, consultations, planning applications to name but a few.

Bord na Móna are seeking clarification in relation to what the council mean by "development" and what 'peatland area' means.

This might put some perspective on the statement above and provide more clarity.

We may subsequently suggest re-wording of this statement/sentence pending clarification of the above.

We look forward to your response in this regard.

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## Request for clarification\_peatland corridor

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

**Ábhair:** green  
infrastructure

### 12.14.8.8 Peatways

The draft CDP states the following:

*"...Rather than just developing a singular 'peatway trail' for walkers, it is envisaged that these would be substantial landscape corridors of c. 1 – 2 kilometres wide (i.e. 500m – 1000m either side of the railway or pedestrian trail), that will provide connections for amenity, ecology/ecosystem services. The Peatway Trails and Corridors will provide a strategically planned network of natural and semi-natural areas (bogs and rewilded areas) with other environmental features (such as re-wetted peatlands, wetlands, lakes and ponds) designed and managed to deliver a wide range of ecosystem services such as air quality, space for recreation and climate mitigation and adaptation. They will also provide important wildlife corridors and will be free for energy infrastructure such as solar farms and wind turbines."*

Bord na Móna request clarity on the above paragraph. It is not clear what the council means by a “corridor” and a “trail”. As it stands the paragraph current reads that any land use would be constrained to a corridor of 1-2 km wide and in some cases this would also include the trackway depending on the physical nature of the bog and its intended further land use.

This would not be practical based on the potential land use plans notwithstanding other factors that would need to be considered such as;

- The majority of rail bed occupies the outer boundaries of the bogs so they would be adjacent to 3rd party lands.
- Outside of a rail corridor of 5 – 6 metres width some bogs will be wet and inaccessible following Peatland rehabilitation
- In some instances, the cycle path may be on a renewable energy site which will be developed before any path/trail.
- Insurance issues regarding allowing licensed access onto large expanses of rehabilitated peatlands also to be considered.

Bord na Móna are seeking further clarification for section 12.14.8.8. and what the council mean by “corridor” and “trail”.

Bord na Móna may subsequently suggest re-wording of this section pending clarification of the above.

We look forward to your response in this regard.

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## **Bord na Móna future land uses\_amenity/recreation**

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

**Ábhair:** landscape, recreation, amenity

### **13.6.4 Greenways, Blueways, Peatways and Trails**

The Draft CDP plan includes the following objectives:

- 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 Investigate the feasibility of developing a Midlands 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.

Bord na Móna recognises the potential of our cutaway peatlands for recreation and tourism uses from the success of both the Lough Boora Discovery Park and the Mountlucas Wind Farm amenity in County Offaly. We consider that ‘greenways’ across Bord na Móna bogs can be co-located successfully alongside other commercial developments or biodiversity and nature conservation measures etc. with minimal impacts.

Now as we have ceased peat extraction further significant opportunities to enhance, expand and develop an integrated network of greenways across our peatlands will emerge. Our experience to date at Mountlucas Wind Farm demonstrates how both renewable opportunities and Greenway Infrastructure (amenity) can co-exist successfully. At this site an 84MW Wind Farm project co-exists alongside rehabilitated cutaway and 10km of walking/running/cycling tracks for people living in the local communities. With the wind assets occupying a mere 5% of the 1,100-hectare site, this rehabilitated cutaway has helped significantly mitigate carbon emissions and also developed into a rich ecosystem with a range of different habitats for native plants and animal species. It is intended that similar amenities will be provided at all consented and proposed Bord na Móna Wind Farm projects, including the proposed ...

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## **Request for clarification\_peat bogs compatibility**

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

**Ábhair:** landscape

### **13.3.2 Impact of Development on Landscape**

With reference to Table 13.4 Likely Compatibility between a range of land-uses and proximity to Principal Landscape Sensitivity Factors

The Draft Kildare County Development Plan invites submissions across a broad range of important topics and Bord na Móna can make a significant positive contribution across many of these areas. In particular, Bord na Móna believes we have a significant role to play in delivering on climate action & energy policy, supporting natural heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

Upon review of table 13.4 it is noted how low peat bogs scored across a range of sectors. For example, with respect to the 'Industrial Projects' it would be assumed that industries such as renewable energy are rated at zero. This is in stark contrast to the policies and objectives listed in previous chapters in particular Chapter 6 Infrastructure & Environmental Services and Chapter 7 Energy and Communications.

Bord na Móna respectfully requests clarification on what the council means by 'Industrial Projects'?

It is important to iterate, the bogs of Bord na Móna are a land resource of national significance that offers a range of opportunities and options for new beneficial socio economic uses. These lands have the potential to support national policy objectives across a range of sectors including rural development and employment, renewable energy, industrial uses, recreation and tourism, and biodiversity.

We look forward to your response in this regards.

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## **7 - Energy & Communications**

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

**Ábhair:** energy

### ***Section 7.5: Wind Energy***

In Paragraph 2 of Section 7.5 of the Draft CDP it is stated that the Wind Energy Strategy “has been prepared in accordance with the provisions of the Department of the Environment, Heritage and Local Government’s Draft Guidelines for Planning Authorities on Wind Energy Development (2019)”. There are further references to the Draft 2019 Guidelines in Section 15.11.1 and in the Wind Energy Strategy.

We would respectfully request that text referencing the 2019 Draft Wind Energy Development Guidelines for Planning Authorities is amended to reference the 2006 Guidelines and “any subsequent update of these Guidelines” in the interests of clarity and consistency with national policy. The text could be amended to mirror that included in Policy EC P4 with one minor change (in red) as follows:

“EC P4: Have regard to the Department of the Environment, Heritage and Local Governments ‘Guidelines for Planning Authorities on Wind Energy Development’ (2006) (or any subsequent updates) .....”

#### Section 7.5: Wind Energy – Objective EC O15

We note the proposed inclusion of Objective EC O15 with respect to the inclusion of decommissioning and site rehabilitation plans as part of any wind farm development application. Decommissioning is currently addressed as part of the Environmental Impact Assessment Report for projects that exceed the EIA threshold. While we welcome the statement that disposal of end-of-life blades to landfill will not generally be permitted, we do have concerns, given the circa 30 year life span of Wind Farm developments, that developers will not be able to provide specific details at planning application stage with respect to the recycling facilities and/or wind turbine repurposing facilities that will be used at end of life. We would respectfully suggest that this wording should be amended to state that sustainable waste management solutions should be explored for wind turbine components at end of life in compliance with the waste management hierarchy and the legislation and policy in place at that time.

#### ***Section 7.10: Strategic Energy Zones***

Bord na Móna welcomes the inclusion of Policy EC P9 and Objective EC O35 with respect to the identification of Strategic Energy Zones in the County in co-operation with the Eastern and Midland Regional Assembly (EMRA).

It is stated in RPO 7.35 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region that the Eastern Midlands Regional Assembly (EMRA), in conjunction with Local Authorities in the Region, will identify Strategic Energy Zones as “areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas”.

Bord na Móna believe that cutaway bogs play an important role in the generation of renewable energy and will continue to do so into the future. It is our intention to continue developing renewable energy projects on our bogs and our goal is to be the largest producer of renewable electricity in Ireland. Our sites are brownfield in nature, have limited environmental constraints and are largely removed from large numbers of sensitive receptors. They are also in close proximity to the national grid and have good road access. These factors make them prime sites for the development of large scale integrated[1] renewable energy projects and associated developments.

The suitability of cutaway peatlands for renewable energy developments in particular wind energy has been highlighted in the National Planning Framework (Project Ireland 2040) and in the aforementioned RSES which states that “Bord na Móna peatlands .... have potential for beneficial uses including renewable energy, biodiversity,



amenity uses, water storage and other infrastructure". The RSES also states that "In the consideration of development on peatland areas, the following Guiding Principles should apply: Consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production".

It is our view that the finalised CDP should be consistent with the National Planning Framework and the RSES for the Eastern and Midlands Region and that Chapter 7 should therefore call out and support the suitability of cutaway peatlands for renewable energy projects. By acknowledging this potential the Council would stand positioned to support appropriate commercial and industrial development on Bord na Móna lands secure in the knowledge that given the scale and spread of our landbank that suitable commercial and industrial development can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape: as demonstrated by our wind farm at Mount Lucas in County Offaly and as proposed in the recently consented Bord na Móna/ESB Solar Farm project on Timahoe North Bog and as proposed in our wind farm development plans at Ballydermot Bog on the Kildare and Offaly border.

The development of renewable energy projects on these lands has the potential to make a significant contribution to national policies and objectives across a range of sectors including renewable energy, industrial development and job creation in rural areas, ecosystem services and biodiversity as well as tourism, amenity and recreation. As outlined previously in many cases a number of these uses can be co-located thereby providing enhanced economic benefits to the areas in which such developments are located through direct and indirect employment opportunities. The optimisation and the realisation of the full potential value of the company's land bank is dependent on national, regional and local planning.

[1] In this sense, 'integrated' includes where appropriate a combination of complimentary generation technology, energy storage, electrical transmission/distribution infrastructure, potential onsite large volume off-takers (e.g. data centres).

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## 7 - Energy & Communications

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

**Ábhair:** energy, communication

### 7.12.7 Peatlands – Comments on EC P17, EC O51 and EC O56

We note the references throughout the draft plan to the preparation of a comprehensive after use framework plan for the industrial peatlands and associated infrastructure, in particular the inclusion of Policy EC P17 and Objective EC O51.

Bord na Móna published its first long-term land use strategy, Strategic Framework for the Future use of Peatlands in 2011. Much of the strategy outlined in this framework document still holds true and is relevant; however, with the significant and accelerated change that has taken place in the intervening period and with the emergence and identification of new potential future land uses, we have engaged in a review of this framework. As outlined previously the Bord na Móna landholding is a land resource of national significance that offers a range of opportunities and options for new beneficial uses. It is clear that these lands have the potential to support national policy objectives across a range of sectors including rural development and employment, renewable energy, recreation and tourism, and biodiversity. We expect to publish a revision of the Strategic Framework in 2022 and it will be made available to stakeholders.

Section 7.12.7 of the draft plan also states that “The Council considers that there is significant potential to develop a Green Energy Hub in County Kildare, which focuses on the higher order aspects of the industry such as research, new technologies, headquarter development, assembly, maintenance and financing”. Bord na Móna supports this policy and would like to make reference to the Learning Hub installed at the Mountlucas Wind Farm visitor centre as an example of such an initiative. This hub contains a series of interactive hands-on activities based around wind energy and technology and is an example of how other beneficial uses can be integrated successfully with wind energy developments.

The Draft CDP lists a number of objectives and specific projects that can be undertaken in County Kildare to help achieve a low carbon climate resilient and environmentally sustainable economy. Many of these objectives are aligned with the objectives of the ‘Strategic Framework for the Future Use of Peatlands’<sup>[1]</sup> document and our ongoing transition to diversify into new sustainable business areas in order to strengthen the company and support jobs in the midlands into the future.

Central to this sustainable transition is the use of Bord na Móna’s land bank for a range of beneficial commercial, environmental and social uses such as renewable energy, industrial uses (including but not limited to data centres), biomass cultivation, ecosystem services and biodiversity as well as recreation and tourism. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located

#### ***7.12.7 Peatlands – Comments on EC A7- National Peatlands Park***

As outlined previously, Bord na Móna note the inclusion of Action EC A7 [in addition to Objective RE O127 in Chapter 4] with respect to proposals for a New National Peatlands Park on Bord na Móna cutaway bogs in Kildare, Laois and Offaly. Bord na Móna are happy to support the development of peatlands park and to engage with the relevant stakeholders as required where proposals are compatible with our integrated land-use strategy (such as renewables, industrial, forestry, biodiversity and ecosystem services, amenity and tourism), which supports other national and regional policies and maximises the overall potential of the land-bank.

The Bord na Móna land bank provides a unique opportunity to develop a range of beneficial commercial, environmental and social uses across the midlands. It is important however to note that in every instance, future climate action projects and renewable energy developments are considered a precursor to the development of amenity and to land use plans

[1] Bord na Móna Strategic Framework - Future Use of the Peatlands is under review and to be published in 2022

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## **7 - Energy & Communications**

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

**Ábhair:** communication

### ***7.13.1 Data Centres & Energy Supply – Comments on EC P18***

Bord na Móna welcomes this Policy and as part of the land transition programme, Bord na Móna is continually reviewing its property strategy to determine future industrial uses for the holdings. Whilst buildings such as workshops and stores comprise a small portion of the holding, these buildings present opportunities for the repurposing of these facilities for new sustainable industries. The company has repurposed its former briquette production facility in Littleton in County Tipperary as a plastics recycling facility supporting 40 new jobs. More opportunities will exist for more of our facilities and in this regard.

## **Appendix 2 Wind Energy Strategy**

Following review of the Draft Wind Energy Strategy (WES) it is noted Bord na Móna lands in the west of County Kildare have been designated as “Open to Consideration” as opposed to “Acceptable in Principle” for wind energy development. While we welcome the inclusion of our lands in the strategy, it is not entirely clear from the document how particular features (i.e. high amenity areas, ecological and landscape sensitivities, proximity to settlements and other technical considerations) have been considered, and whether any buffers/setbacks are being applied, in order to designate lands into the three zones outlined in the WES.

It is our view that the Wind Energy Strategy should be consistent with the aforementioned National Planning Framework (Project Ireland 2040) and the Regional Spatial and Economic Strategy for the Eastern and Midland Region which exclusively calls out the suitability of “the extensive tracts of publicly owned peat extraction areas” for renewable energy by stating the following:

“Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy.” [National Planning Framework, Section 3.2, pg. 35]

And

“Local authorities should harness the potential of renewable energy in the Region across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy”. [RSES, Section 7.9, pg 179]

We therefore encourage Kildare County Council to recognise and support the importance that cutaway bogs have in terms of renewable energy generation specifically in Chapter 7 of the Draft Plan and in the WES.

The WES is a strategic document and at that level it is appropriate to apply high level assumptions. However, from our experience with developing wind energy projects on our bogs and the associated detailed environmental reports and assessments that are required, it is evident that often areas that have been identified at a high level as not being suitable/or being less suitable for wind energy development which would, at a site-specific level, be considered suitable. This is also evident in the reverse. In this context, careful consideration needs to be given to the zoning of areas for renewable energy development going forward, so as not to constrain out any areas which may have renewable energy potential, particularly for wind generation. Such an approach will assist developers in bringing projects forward to contribute towards the 80% target for renewable energy production out to 2030.

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## **9 - Our Rural Economy**

## 9.8 Bogs and Peatlands

We note the following statement in Section 9.8 Bogs and Peatlands: “The council recognises the potential of industrial peatlands in relation to re-wetting, re-wilding, carbon sequestration and after uses with job opportunities.” We would respectfully request that the text be amended as follows (amended text in Red) to ensure consistency with National and Regional Planning Policy as previously outlined in our comments on Chapter 7.

**“The council recognises the potential of industrial peatlands in relation to renewable energy, industrial development, ecosystem services, biodiversity (re-wetting, re-wilding), and carbon sequestration as well as tourism, amenity, recreation and after uses with job opportunities.”**

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## 12 - Biodiversity & Green Infrastructure

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

Ábhair: green  
biodiversity, infrastructure

### Chapter 12

#### Section 12.11: Wetlands and Ramsar Sites

Paragraph 3 Section 12.11 states that “As developments sited on peatlands have the potential to increase overall carbon losses, potentially undermining expected carbon savings (in the case of renewable energy developments) and damaging rare habitats of European importance, these factors must be considered in any environmental or ecological impact assessment prepared to accompany any planning applications.”

It is our view that a distinction should be made in this statement between Peatlands and Cutaway Peatlands. From our experience developing Renewable Energy Projects on cutaway peatland sites carbon lost to the atmosphere due to changes in the peat environment, changes in the cycling of mid-merit gas-fired generation units and due to the construction, operation and decommissioning of the proposed development represent a small fraction of the total carbon emissions that will be offset by the proposed development. For example, on wind farm projects, it has been determined that the volume of CO<sub>2</sub> lost to the atmosphere would be offset by the proposed development within 1 - 2 years of operation, depending on the fuel source to which it is compared.

We note the references throughout Chapter 12 with respect to Green Infrastructure on Bord na Móna lands in particular the focus on the Bog of Allen and would like to make the following comments:

#### **Section 12.14.4**

Action BI A22 outlines the Councils intent to work with Bord na Móna to prepare a Green Infrastructure Masterplan to delineate core areas, stepping stones and corridors through Bord na Móna lands. We welcome this focus with respect to the opportunities that are possible and acknowledge the potential for linkage of greenways and blueways through our peat lands (via 'peatways'). We recognise the potential of our cutaway peatlands for recreation and tourism uses from the success of the Lough Boora Discovery Park and consider that 'peatways' across Bord na Móna bogs can be integrated successfully alongside other developments or biodiversity and nature conservation measures etc. with minimal impacts.

Bord na Móna continues to support the development of amenity through its peatlands in association with current and future renewable energy projects. The proposal for Ballydermot Wind Farm, which is currently in the pre-planning stage, will include an amenity plan for the site which will ultimately seek to provide connectivity from the wind farm to the Grand Canal in the north, through Cloncreen Wind Farm to the west and to other amenity facilities in the wider area where possible. The plan will also outline opportunities for connectivity through other Bord na Móna bogs in the future.

It is also noteworthy that the Bord na Móna Biodiversity Action Plan supports the development of green infrastructure and the integration of such infrastructure with future commercial development where appropriate as well as adjoining areas of conservation with high biodiversity value. Other future Bord na Móna land use strategies and future commercial development will support the County Development Plan in the development of Green Infrastructure. The Bord na Móna Biodiversity Action Plan represents a clear commitment from the Company to plan and execute the future use of its peatlands in an ecologically sound manner.

#### **Section 12.14.6.5**

We note the following text included in Section 12.14.6.5 and would like to propose the following amendment:

This masterplan should, at a minimum, include the following 'core areas' – one should centre around Lullymore Heritage Park, Lullybeg Wetlands, Butterfly Reserve, Lodge Bog; a second core area would focus on Ballynafagh Bog, Ballynafagh Lake and Hodgestown Bog; a third area would focus on Killinthomas Wood (Coillte owned), Ballydermot Bog East; a fourth would focus on Ummeras.

It is our view that buffers would need to be considered for all core areas and would depend on the nature and extent of any development proposals and their associated potential impacts.

#### ***General Comment on Chapter 12***

There are numerous references throughout Chapter 12 with respect to the percentage (50%) of Bord na Móna lands that will remain free from any development (e.g. last sentence in Section 12.14.6.5, 12.14.6.6 etc.).

Bord na Móna respectfully request clarification and consistency with respect to these references as currently it is our view that they could be interpreted in many different ways and it is not clear what the council means by the term “development” and “peatland area”.

This statement could read that the council may also be constraining amenity, rehabilitation works, or any other future land use.

It is unusual for a County Development Plan to constrain lands in such a manner, particularly when there are conflicting policies and objectives within the plan with respect to designation of Strategic Energy Zones, Future land use plans and Green Infrastructure Plans etc.

Similar text is also referenced in Chapter 9 (specifically in Objectives RD O28 and RD O29). However, the wording is slightly different in each instance for example Objective RD O28 references supporting “the sustainable re-use of circa 30-50% of cutaway boglands for economical purposes” whereas Objective RD O29 references supporting “the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway bogs”.

We may subsequently suggest re-wording of these statements/sentences pending clarification of the above.

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## 12 - Biodiversity & Green Infrastructure

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

**Ábhair:** green  
infrastructure

### 12.14.8.8 Peatways –

Section 12.14.8.8 of the draft development plan identified three primary peatway “corridors” and states the following with respect to these “corridors”:

*“Rather than just developing a singular ‘peatway trail’ for walkers, it is envisaged that these would be substantial landscape corridors of c. 1 – 2 kilometres wide (i.e. 500m – 1000m either side of the railway or pedestrian trail), that will provide connections for amenity, ecology/ecosystem services. The Peatway Trails and Corridors will provide a strategically planned network of natural and semi-natural areas (bogs and rewilded areas) with other environmental features (such as re-wetted peatlands, wetlands, lakes and ponds) designed and managed to deliver a wide range of ecosystem services such as air quality, space for recreation and climate mitigation and adaptation. They will also provide important wildlife corridors and will be free for energy infrastructure such as solar farms and wind turbines.”*

Bord na Móna request clarity on the above paragraph. As it stands the paragraph currently reads that a corridor of 1-2 km wide would essentially be sterilised from future development and in some cases this would also include the trackway depending on the physical nature of the bog and its intended further land use. As outlined previously, It is unusual for a County Development Plan to constrain lands in such a manner, particularly when there are conflicting policies and objectives within the plan and its associated appendices with respect to designation of Wind Energy Development Areas, Strategic Energy Zones, Future land use plans and Green Infrastructure Plans etc. As an

example, with respect to Corridor No. 1 specifically i.e. Rathangan Town/Killinthomas Wood north to Ticknevin, this corridor sits within an area designated in the draft Wind Energy Strategy as being “Open to Consideration” for Wind Energy Development yet, the inclusion of the text in Section 12.14.8.8. directly conflicts with that designation as it states that these corridors will be “free from energy infrastructure such as solar farms and wind turbines”. The designation of such a corridor also conflicts directly with the National Planning Framework and the Regional Spatial and Economic Strategy for the Region, which, exclusively call out the suitability of “the extensive tracts of publicly owned peat extraction areas” for renewable energy.

As outlined previously, we welcome the focus with respect to the opportunities that are possible and acknowledge the potential for linkage of greenways and blueways through our peat lands (via ‘peatways’). We fully believe that these linkages can be integrated successfully alongside other developments or biodiversity and nature conservation measures etc. with minimal impacts. However, in every instance, future climate action projects and renewable energy developments are considered a precursor to the development of amenity and to land use plans.

Bord na Móna request a review of this section of text and we are seeking further clarification for section 12.14.8.8. on what is meant by “corridor” and “trail”.

We may subsequently suggest re-wording of this section pending clarification of the above.

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## 13 - Landscape, Recreation & Amenity

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

**Ábhair:** landscape

### 13.6.4 Greenways, Blueways, Peatways and Trails

Comments on Objectives LR 039 and LR 040:

Bord na Móna have included extensive comments on the establishment of Green Infrastructure across our lands and also on the proposed development of a National Peatlands Park in our feedback on preceding chapters, most notably Chapter 7 and Chapter 12. It should be assumed that the comments made in those sections apply to Chapter 13 also.

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## 13 - Landscape, Recreation & Amenity

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

**Ábhair:** landscape

### 13.3.2 Impact of Development on Landscape

The Draft Kildare County Development Plan invites submissions across a broad range of important topics and Bord na Móna can make a significant positive contribution across many of these areas. In particular, Bord na Móna believes we have a significant role to play in delivering on climate action & energy policy, supporting natural

heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

Upon review of table 13.4 it is noted how low the peat bogs have scored across a range of sectors. For example, with respect to the 'Industrial Projects' it could be assumed from the table that industrial industries being rated at zero, will therefore not be allowed on our lands. Similarly, with respect to wind and solar, the scoring indicates that bogs are not particularly suitable for these developments when the contrary is the case, as is evidenced by number of operational and consented renewable developments across our land bank. The information in this table also contradicts many of the policies and objectives listed in previous chapters of the plan in particular Chapter 6 Infrastructure & Environmental Services and Chapter 7 Energy and Communications.

Bord na Móna respectfully requests that the Council reviews these tables in the context of the overall policies and objectives of the plan.

It is important to iterate, the bogs of Bord na Móna are a land resource of national significance that offers a range of opportunities and options for new beneficial uses. It is clear that these lands have the potential to support national policy objectives across a range of sectors including rural development and employment, renewable energy, industrial uses, recreation and tourism, and biodiversity.

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**Documents Attached:** Níl  
**Teorainneacha Gafa ar an léarscáil:** Níl