



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

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 CO₂ 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.

Documents Attached: Níl