

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

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Cover Letter

Umeras Community Development welcomes the new vision that Kildare County Council is putting forward in the County Development Plan to recognize significant changes that have taken place since the last county development plan was adopted. Specifically, the development of the Barrow Blueway, Ireland's fifth national Blueway, which is currently being constructed provides the people of Kildare and Ireland with a new amenity that will be the backbone of a new nature-tourism zone in West/South Kildare/East Offaly/NE Laois. We welcome Kildare County Council's Green Infrastructure Strategy (12.14.5) which provides a new vision for the county by linking core areas and steppingstones through corridors that will create the framework for the economic regeneration of previously unconnected towns and villages such as Robertstown, Rathangan, Monasterevin and Athy. We wish to make some specific recommendations to the Draft Development Plan which are listed below with references to the relevant section.

We believe that this Draft County Development Plan has taken a major step forward in developing a vision for a Green Infrastructure Strategy that presents a holistic approach to planning in the county. It would be useful in the introduction if a master map could be presented mapping out Green Infrastructure, local and nationally important biodiversity areas, and key tourism to demonstrate which core areas, corridors and nodes require enhanced protection. It would seem that the Wind Energy Strategy and SEA were based on the last County Development Plan and not the new Green Infrastructure Strategy and are already out-of-date and need to be revisited prior to finalization.

We congratulate Kildare County Council on developing a holistic vision for the balanced development of the county in the new Green Infrastructure Strategy and look forward as a community group to contributing to the implementation of this strategy. There are existing and emerging community and environmental groups such as Umeras Community Development and Lullymore Heritage Park ready to partner with the county council in driving this vision.

Observations

Chapter: Volume 1 – chapters: 1. Introduction & Context

Topic: 1. Introduction

Summary points

We welcome the leadership of KCC which recognizes the need to harness our natural assets for nature, the environment and the public good.

The once in a lifetime opportunity to create new biodiversity areas from the Bord na Mona decommissioned peatlands should be central to the target to achieve 27% of the county for nature up from the current 3%. The once in a lifetime opportunity of rewilding state-owned land held by Bord na Mona creating a National Peatlands Park (see map below) of scale, will not only help Kildare achieve its carbon and biodiversity targets - it also has the potential to

transform the lives of rural communities, reconnect people to their landscape and other sustainable employment for generations to come.



Concept Map of National Peatlands Park (<https://www.nationalpeatlandspark.com/>)

This target can only be achieved if peatlands are central to the initiative. It is clear from the Green Infrastructure Map in Chapter 12 that the main opportunities for the development of new protected areas are in the decommissioned peatlands and associated peat soils on agricultural land, floodplains of major rivers, and Coillte forests as a large portion of the county is given over to intensive agriculture.

The core-steppingstone-corridor model is very innovative but needs to adopt a landscape approach to biodiversity enhancement and nature tourism.

Umeras Community Development CLG (UCDCLG) are partners in an innovative FarmPEAT Environmental Innovation Partnership (EIP) which seeks to enhance biodiversity on farms surrounding Umeras Bog. UCDCLG has also received positive feedback from both Bord na Mona and Coillte on developing Umeras Peatlands Park on Umeras Bog and linking the bog to the Blueway through adjacent Coillte forestry. There is an opportunity for partnerships between UCDCLG, Bord na Mona, Coillte, Waterways Ireland, Kildare County Council and local landowners to enhance biodiversity across the whole landscape through a mosaic of habitats with enhanced conservation.

The objective of 50% of peatlands to be excluded from development does not make sense as one cannot for example create a protected area on a decommissioned bog to protect threatened bird species such as Curlew, Lapwing, Hen Harrier, etc. while simultaneously hosting wind turbines on a portion of the same bog. There is a clear need for 100% of certain bogs to be separately designated as protected areas for biodiversity separate from industrial development. The National Peatlands Park group has identified bogs in West Kildare which should receive full protection and this should be recognized in the new County Development Plan.

Main Comment

The innovative Core-Stepping-Stones-Corridor Green Infrastructure strategy provides an opportunity to designate important biodiversity and nature tourism sites and routes in the county that should be offered enhanced protection. KCC needs a vision that extends beyond the life of the next County Development Plan up to 2050 which will see economically-depressed communities in West and South Kildare be regenerated by nature-tourism zoning of these Green Infrastructure areas. This has already been recognized in the Barrow Blueway Economic Plan, West Kildare Just Transition Plan and Revised Kildare Tourism Strategy. We believe that communities need to be at the centre of these initiatives as there is considerable capacity in County Kildare to regenerate out county using our human and natural resources.

Main Requests

1.8.1 Overarching Guiding Principles: Add new Guiding Principle:

Develop the Green Infrastructure Strategy to protect and enhance the natural assets of the county to create a strong nature-tourism brand in the county using the backbone of our canals as corridors joining significant nature and tourism sites to regenerate economically-depressed areas close to the canals, forests and bogs of Kildare and achieve a target of 27% protected areas for biodiversity.

Main Reasons:

Under the EU Biodiversity Strategy 2030, EU Member States are required to designate 30% of their land and marine areas for conservation and biodiversity. This target should be explicitly stated in Chapter 1.

Chapter 4: Resilient Economy & Job Creation

4.21 Tourism

Main Comment

We welcome the recognition that the key focus for the Midlands/Mid-East Failte Ireland Region will be the further development of the local culture and heritage Product.

4.21.1 Tourist Attractions in Kildare

We welcome the recognition of the bogs and canals as important tourism areas.

Policy

Main Request

Include a new policy statement to recognize the importance of the establishment of the 5th National Blueway – the Barrow Blueway – in Kildare as an opportunity to create a major nature-tourism brand in West and South Kildare as recognized in the new Green Infrastructure Core-Nodes-Corridor Strategy as follows. The plan should reference the Barrow Blueway Economic Plan, the West Kildare Just Transition Plan and the revised Kildare Tourism Strategy which all recognize the opportunity for new tourism hubs in Kildare centred on the Barrow Blueway as a corridor as follows:

Promote the development of the Barrow Blueway as a major Blue and Green in infrastructure to promote nature tourism hubs in the county linked to existing and new nature and tourism sites.

Main Reason: The Barrow Blueway is the most significant tourism development in the county over the past 10 years and provides the opportunity to create a major nature-tourism brand in the county to regenerate economically-depressed communities in West and South Kildare and links to Offaly and Laois.

4.24 Peatland Tourism

We welcome the support for Umeras Peatlands Park and Lullymore Heritage and Discovery Park to increase access and educational value of the bast peatland network in the county and as part of a wider National Peatlands Park. Our group has already received positive indications of support from Bord na Mona and Coillte for the development of Umeras Peatlands Park and welcomes KCC's strong support for the initiative.

We welcome the objectives REO125, 126, 127 and 130 to support peatland conservation and tourism at Umeras Peatlands Park.

Main Request

That the Map on Page 43 is updated in line with the Green Infrastructure Map which recognizes Umeras Peatlands Park as a stepping stone for nature tourism. We would also recommend the inclusion of Church of Oak on the map. This creates a new tourism hub incorporating Monasterevin, Rathangan, the Barrow Blueway, Umeras Peatlands Park and Church of Oak and this should be highlighted on the map. It is our understanding that the new Into Kildare Strategy recognizes the potential of this new tourism hub and this should be featured on the new Kildare Tourism Map.

Main Reason

As stated, the new Kildare Tourism Strategy, Barrow Blueway Economic Plan and West Kildare Just Transition Plan all recognize the potential of Umeras Peatlands Park and this should be added to the Kildare Tourism Map along with Church of Oak.

Main Request

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**.

Amendment : use the term National Peatlands Park for consistency and recognition

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.

Chapter 9 Rural Economy

Background 9.1

Kildare is well positioned.....

Insert : as a gateway county to the Midland Peatlands and the West from Dublin to contribute more to the tourism sector with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaways providing an alternative eco-tourism and activity based experience.

RD O11	Support the implementation of the objectives identified in the County Biodiversity Plan 2009-2014 and any relevant local action plan.
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Amendment : Support the implementation of the objectives identified in the County Biodiversity Plan (insert new dates) and the Local Just Transition Plan 2022

Reason : the County Biodiversity Plan is out of date.

RD O20	Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing.
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Amendment : **RD020** Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing **with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation .**

RD O22	Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates.
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Amendment : Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates **with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation .**

Bogs and Peatlands 9.8

Peatlands form a distinctive aspect of Kildare's landscape.....(

Insert :The cessation of peat extraction by BNM provides tangible opportunities for West Kildare as a gateway county to the Midland Peatlands and the West. The potential of a National Peatlands Park and the development of the Blueway can greatly assist a Just transition for communities in the area and lead to successful economic regeneration and a sustainable local economy. The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.

RD P1

REASON: More specific with peatlands – “peatlands rehabilitation and sustainable peatland related tourism”

RD 08

REASON: Include morecontinued roll out of the National Broadband Scheme - and initiatives such as the EU Smart Villages Initiative.

Chapter 12 Biodiversity and Green Infrastructure

12.5.3 County Kildare Biodiversity Action Plan 2009-2014 The Council adopted its first Biodiversity Action Plan in April 2009 in accordance with the National Biodiversity Plan. The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. ~~The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan.~~ ***A new County Kildare Biodiversity Action Plan will be published by 2024***

Reason; a central Kildare resource containing biodiversity aims, objectives and initiatives is essential. This document will illustrate the large reach, responsibility and accountability of the Council and partner organisations for biodiversity and the protection of nature. This new enhanced objective to reach 27% of land for nature (see ch 13) should provide the cornerstone of the Plan with milestones for the achievement of this target. A published document will help inform the public, ensure implementation and form a tool to keep track of progress

Main Request:

This section needs to recognize the importance of floodplains as set out in the detailed Green Infrastructure Map. The floodplain of the Barrow SAC along the Figile River west of Umeras Bog is a critical biodiversity area for breeding curlew and one of the Conservation Action areas identified by the NPWS. The area has been recognized by Birdwatch Ireland as one of the most important bird areas in the county with nationally-important flocks of Golden Plover (3000+ birds), Lapwings (200+ birds), Whooper Swans (300+ birds), and other red-listed species including snipe, kestrel, etc. breeding in this area.

Main Reason:

The biodiversity strategy needs to recognize that many threatened species exist in important floodplain areas and these areas should be protected.

Main Request:

The biodiversity strategy also needs to recognize the importance of Coillte forests to create new biodiversity areas. There are opportunities to manage Coillte forests for biodiversity and this should be highlighted in the County Development Plan.

12.14.6.8

12.14.6.8 Ummeras Bog This area is proposed for a Peatlands National Park, which is supported by the Council

Amendment: Ummeras Bog ***This area is proposed for a Peatlands National Park which is supported by the Council and will form part of the National Peatlands Park.,***

Chapter 13: Landscape, Recreation & Amenity**Comment**

We welcome the innovative Green Infrastructure Policy which involves a holistic approach and should be provided as an integral part of sustainable development. However, the current landscape maps and approach are dated from 2004 and are completely outdated. The development of a 5th National Blueway as a backbone to a new nature-tourism corridor focusing on core areas such as Umeras Peatlands Park and nodes needs to be recognized in the landscape assessment and this nationally-important protected scenic route needs to be afforded protection from intrusive industrial development.

Main Request: The previous County Development Plan provided for a 300m buffer from scenic routes from wind turbines at a time when turbine were 50m in height. The latest turbines being proposed in County Kildare are 220m in height and the setback from the Blueway needs to reflect the importance of this nationally important scenic route and should be at least 10 times the turbine height or a significant distance. The position of Kildare County Council should be consistent with that outlined in the CAAS report commissioned by Kildare County Council in it's submission on the Maighne Wind Farm.

Main Requests

BIA22 – Change “Work with Bord Na Mona to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors..”

To:

Work with Bord Na Mona, Coillte, Waterways Ireland and local community and environmental groups to prepare a Green Infrastructure Masterplan that will inform the delineation of core areas, stepping stones and corridors..”

Main Reason

It is a key recommendation of the West Kildare Just Transition Plan that a tripartite approach (Kildare County Council/Government agencies/Communities & NGOs) is adopted to plan for the future of the region. Local communities and environmental groups must be central to any development of a Green Infrastructure Masterplan. Already groups such as Umeras Community Development, the National Peatlands Park,. Tidy Towns, Lullymore Heritage Centre are working on grassroots initiatives to develop green infrastructure and need to be equal partners in any masterplan development.

Main Request

Revise the Green Infrastructure Concept Map to recognize Umeras Peatlands Park as a Core Area consistent with the text in 12.14.6.8 which includes Umeras Bog as a Core Area.

Main Reason

The development of Umeras Peatlands Park is strongly supported by Kildare County Council and Bord Na Mona and Coillte have provided positive feedback on the draft Strategic Plan. We believe that Umeras Peatlands Park will be a core nature/tourism initiative in County Kildare and this need to be reflected in the map.

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.

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.

LRO42

Lead and support the extension and interconnection of Greenways, Blueways, Peatways and trails within and outside County Kildare in consultation with Coillte, Bord na Móna and all other relevant stakeholders.

The creation of a successful community-led tourism destination supported by Kildare County Council, Failte Ireland and other stakeholders following the Blueway and encompassing peatland areas to the west as part of a National Peatlands Park has the potential to offer the visitor a unique experience to get “lost in wilderness” in a relaxed environment away from urban life. The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage would significantly support the future growth of tourism in Kildare and the midlands.

Comment

We welcome the support for the development of a National Peatlands Park as a major opportunity to regenerate the biodiversity and economy of West and South Kildare through nature-based tourism core areas linked by corridors to nodes which will create new tourism hubs.