

Chapter 13: Landscape, Recreation and Amenity

13.3 Landscape Character Assessment

We note **LR O13** and recommend the following:

LR O13: Recognise that cutaway and cut-over boglands represent degraded landscapes and/or brownfield sites and thus are potentially fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions

Revised LR O13: Recognise that *some* cutaway and cut-over boglands *may* have the characteristics of ~~represent~~ degraded landscapes and/or brownfield sites and thus *may* potentially be fit to absorb a variety of development provided that the development proposal does not increase Green House Gas emissions *or damage protected or high nature value habitats, or species.*

We note **LR T1** and recommend the following:

Revised LR T1: Endeavour to increase the territory of County Kildare designated to nature from 3% to ~~27%~~ **30%** by the end of this Plan period, in response to the Government's commitment to designate 30% of the territory of Ireland for nature by 2030 and in accordance with the EU Biodiversity Strategy 2030. This ~~may~~ *can* be achieved by the development of the proposed ~~Midlands Peatlands National Park~~ **National Peatlands Park** (see objectives in Section 13.6).

13.3.1 Landscape Sensitivity

We note the following in the introduction to this section (and the sensitivity ratings in the accompanying tables):

*Based on the findings of the Landscape Character Assessment a landscape sensitivity rating was developed for each of the Landscape Character Areas. **Landscape sensitivity is a measure of the ability of the landscape to accommodate change or intervention without suffering unacceptable effects to its character and values.** It is determined using the following factors: slope, ridgeline, water bodies, land use and prior development. The Landscape Character Areas have been mapped according to their landscape sensitivity (Tables 13.1, 13.2 and Map 13.2 refer).*

And we note the following actions: LR A1 – LR A3

LR A1: Review and update the County Landscape Character Assessment, within two years of the adoption of this Plan¹, having regard to the European Landscape Convention Florence 2000, in accordance with all relevant legislation and guidance documents and to ensure consistency with the forthcoming National and Regional Landscape Character Assessment. All landscape character designations will be fully reviewed having regard to updated best practice guidance, LCAs of adjoining Local Authorities and other local relevant considerations, including clusters of biodiversity rich areas.

LR A2: Investigate the feasibility of preparing a Historic Landscape Characterisation of the county.

Please revise **LR A3** as follows:

LR A3: Plant gateway roundabouts within the county with innovative design themes, having regard to traffic safety, and the sensitivity of the surrounding landscape. This will be achieved under ecological guidance.

We suggest the following amendment to this section:

Amendment: Reevaluate West Kildare Bogs to Class 5 and postpone decisions which would impact the landscape until an updated County Landscape Character assessment is completed. This would ensure the Bog of Allen's potential for rewilding and tourism is not irreversibly damaged by any proposed developments in the intervening period.

- **Reason:** The original County Landscape Character Assessment was undertaken in 2004 and undervalues the Bog of Allen's historical, cultural, religious and environmental importance. It also fails to reflect the significant rehabilitation and scientific research carried out in many of these peatlands and the growth of both domestic and international tourism to West Kildare over the past 18 years. It is also now widely accepted that **Ireland's raised bogs have global significance as a carbon store and ecosystem treasures** and that their protection and rehabilitation is the first line of defence in mitigating climate change and protecting biodiversity.

13.4 Areas of High Amenity

13.4.4 The River Liffey and the River Barrow Valleys

- Reference to the River Barrow forming part of an SAC should be added to this paragraph for consistency

13.6.2 Forest Parks, Woodlands & Boglands

We note the following in the introduction:

*County Kildare is favoured with extensive peatlands which are no longer used for peat extraction. **These peatlands provide an opportunity for nature-based solutions on a grand scale to our twin crises of biodiversity loss and climate change mitigation.** Peatlands, including restored peatlands and recently rewilded peatlands can be enjoyed as a special new amenity of unique and enduring value for the local people and economy. In addition, these peatlands present an opportunity to increase the percentage of designated land in the County for nature in order to reach Target LR T1 in Section 13.3.2 of this Plan.*

- **Comment:** The acknowledgement and recognition of the positive contribution of our natural assets in this chapter on Landscape, Recreation and Amenity is very welcome. However, we would like to point you to our comments in Chapter 12 with reference to **the need to**

employ ecological expertise in any nature-based solutions to reduce potential for any further biodiversity loss.

13.5 Scenic Routes and Protected Views

We point you to Table 13.5 and the portion here below:

R403 and R414 from Allenwood to Rathangan.	East, Lullymore West, Barnaran, Drumsru, Cappanargid, Killyguire and Newtown. Ballydermot Bog Group
--	--

- **Please insert the Ballydermot Bog Group here.**
- The inclusion of the Ballydermot Bog Group is important as this is the view looking westward from Lullymore which is an established peatland tourism hub in West Kildare.
- **Reason:** The panoramic and uninterrupted views across the Bog of Allen to the west are celebrated and promoted internationally by the IPCC and Lullymore Heritage & Discovery Park (which attracted over 54,000 fee paying visitors in 2019).

LR 042: *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.*

LR 042 Amendment: *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.*

13.6 Recreation and Amenities

We suggest the following amendment to LR 040

LR 040 Amendment: ~~Investigate the feasibility of developing a~~ *Support and facilitate the development of a National Peatlands Park in consultation with Offaly and Laois County Councils, 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.*

- **Reason:** for consistency and linkage with RE O127 which states:

- **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