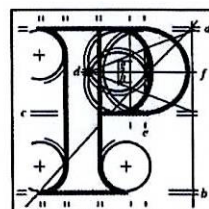


Our Case Number: ABP-316212-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51V293

Date: 08 June 2023

Re: Proposed development of 26 wind turbines and associated works
at the Ballivor Bog Group, County Meath and County Westmeath

Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

BL50A

Teil
Glaio Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA hÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133
e-mail/ríomhphost: bogs@ipcc.ie web/idirlíon: www.ipcc.ie

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

2th of June 2023

RE:Ballivor Wind Farm SID Application REF PA25M.316212

Dear An Board Pleanála,

The Irish Peatland Conservation Council (IPCC) started the Save the Bogs Campaign 40 years ago to raise awareness of the disappearing peatland and the ecosystem services (flood regulation, biodiversity, tourism, carbon sequestration, natural and cultural heritage and amenity) being lost through habitat destruction and fragmentation. The peatland landscape of the midlands has been severely diminished through the industrial extraction of peat for energy and horticulture and this has led to major consequences for the generations that have grown up without the opportunity of experiencing their natural heritage. It is in this regard that we would like to make an **OBSERVATION** on this Strategic Infrastructure Development application.

The proposed development crosses both Counties Meath and Westmeath. County Meath once originally held 6,388ha of raised bog as a resource for biodiversity, freshwater and climate regulation. This has now been reduced to 540ha, just 8.5%. County Westmeath once held 26,702ha of raised bog which has now been reduced to 4,945ha, just 18.5% of the counties original resource (Malone, S. and O'Connell, C., 2009). This destruction of hydrologically and ecologically providing peatland habitat has been a major factor in the Climate and Biodiversity Crisis highlighted by Government in 2019. Peatland once accounted for ~1/5th of the habitat type in Ireland (~1.2M ha) and the loss of ~75% of peatland habitat nationally has irreversibly changed the natural landscape and species composition - reducing our water quality, increasing detrimental emissions to air and water and putting native species on the brink of extinction.

The IPCC are not inherently opposed to wind farms and understand that Bord na Móna have to find new uses for the land bank they manage for the people of Ireland to provide for employment and energy needs, but when the company announced the end of commercial peat extraction in 2019 they have followed a commercial agenda of a Brown to Green publicity strategy and have been pushing the vision that the renewable energy projects can be co-located with biodiversity, but we have yet to see evidence of this. In reality, the original raised bog remnants around the margins of the site (which should be protected) will be used for domestic turf cutting while Bord na Móna attempt to recreate raised bog in an experiment, with huge amounts of fragmentation for the roadways and infrastructure, huge concrete bases and huge amounts of continual hydrological management and drainage. While Bord na Móna profess that only a small percentage of the land is lost to the development and the rest is for biodiversity and climate mitigation, it is not an accurate picture and IPCC echo the National Parks and Wildlife concerns highlighted within their scoping submission that cumulative impacts with other developments, not only wind farms will hinder recovery of biodiversity, especially for wetland species such as wide-ranging species, ground nesting birds and nocturnal migrators.

Furthermore, IPCC are highly concerned that situated right in the middle of this proposed development is a site being featured within the Peatland Climate Action Scheme - Carranstown Bog. This has already received some restoration treatment which is visible from aerial photography (ESRI Satellite). This enhanced rehabilitation project has been funded to ensure that some of Bord na Móna's land is restored, not just rehabilitated, because research has shown (BOGLAND, EPA, 2011) that Bord na Móna's standard rehabilitation does not go far enough in terms of climate change mitigation and biodiversity recovery, in that the standard rehabilitation only aims to reduce emissions to air and water once industrial production has finished at a site and that with predicted climate change, the standard rehabilitation sites will revert back to emitting carbon and not withstand the cli-

40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156

Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Miriam Mooney, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar

Patrons: Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ni Lamhna, Matthijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland, Kathrine Geoghegan

Tina Claffey, Monty Don OBE.

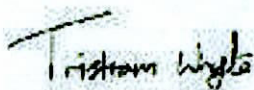
mate pressures predicted. Yet, Bord na Móna plan on surrounding what should be a poster site, with turbines hindering the recovery of biodiversity. While a wind farm has a lifespan of a couple of decades, raised bogs sequester carbon, clean and regulate water and provide for biodiversity for millennia. There is the potential that the development of a wind farm will be detrimental to any possible effective restoration at this site in the future.

Conclusion

While the move away from fossil fuels to meet our energy needs is positive, Ireland is shooting itself in its foot by installing renewable energy infrastructure on brownfield sites. These should be restored fully for biodiversity recovery and climate mitigation as the main focus, Ireland has 60% of Europe's resource of this type of unique habitat and we have international obligations to protect and improve the habitat quality of peatland nationally, yet the potential is being mis-represented by commercial entities. It is IPCC's opinion that the Ballivor Bog Group be managed exclusively for biodiversity so it can support the restoration work in Carranstown Bog, the restoration of the Natura raised bog network and support a real recovery for climate and biodiversity nationally.

Raised bogs are open landscapes and the species which utilise them need open spaces.

Your Sincerely,



Tristram Whyte - Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council

Malone, S. and O'Connell, C. (2009) Ireland's Peatland Conservation Action Plan 2020 – halting the loss of peatland biodiversity. Irish Peatland Conservation Council, Kildare.

BOGLAND:Sustainable Management of Peatlands in Ireland, EPA, 2011