



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA hÉIREANN

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An Board Pleana
64 Marlborough Street
Dublin 1
D01 V902

1st August 2023

RE: Case PA93.317265 - Proposed Windfarm - Dyrick Hill, County Waterford.

Dear An Board Pleana,

The Irish Peatland Conservation Council (IPCC) are writing to make an **observation** on the aforementioned SID application with Case Reference PA.93317265

We have a number of points that have not been addressed within the planning documents.

1. Peat

The IPCC do not accept that there is no peatland in the area. **A**, There is Article 17 Dry Heath present, **B**, The peat depth probes show that there is 0 - 40cm deep peat in places. 30cm is the standard definition for classifying peatland but this classification was based on what would be profitable economically to extract industrially when mapping resources for exploitation, a better method for conservation and protection of habitats is to use at least 30% organic matter content (IUCN Peatland Programme, June 2023). Out of 49 countries investigated within Europe 17 countries do not use depth to classify peatland, 26 use 30cm or less and only 6 use 40cm or more. It is not possible to estimate the actual carbon and biodiversity cost of the proposed development if the peatland is not classified correctly, the actual organic content needs to be established. It is possible that peatland habitats being misclassified would give the wrong figures on carbon loss and cumulative impacts to the future carbon sequestration ability of the landscape. This seems to be a serious loophole in planning and is allowing developers to decide where conservation of important globally rare habitats occurs.

2. Nitrogen

While nitrogen is featured and assessed as part of the proposed development investigations and reports, the preliminary focus has been on designated sites (and human health) and not on the non-designated directly surrounding environment, even though much of the site is within ANNEX I Dry Heath (4030) habitat (which would be nutrient poor and susceptible to wet and dry deposition). IPCC appreciate the investigation into the water courses as vectors for nitrogen deposition and possible impacts to the designated sites including neighbouring fen habitats, but we also need to know nitrogens predicted cumulative affects on the direct receiving environment too, such as the increased vehicular use once construction has finished, surrounding agricultural activities, industrial extraction (e.g quarries/peat extraction/mines), development of road infrastructure and how will all these react together? What impacts will these have on the Dry Heath habitat?

3. Natura Impact Statement

It is not acceptable to lose any amount of habitat for species ANNEXED under the EU Habitats and Species Directives or on national Red-Lists. While the developers have accepted that 0.1% loss of suitable habitat for Golden Plover and a 0.12% increase in mortality rate is quite fine, they are failing to address the Biodiversity part of the Climate Change and Biodiversity Crisis announced by Government in 2019 and our international legal obligations to protect these species. They are failing to address the cumulative and synergistic impacts as to what is the affect on biodiversity when you add all the increased mortality rates (including Lapwing, Ireland's National bird), habitat losses, barriers to movements, affects on nocturnal migrations, future restoration potential, ongoing hydrological management/drainage, fragmentation from infrastructure and disturbance Ireland is working backwards when installing renewable energy infrastructure on to our wetlands and peatlands as they are some of the most rarest habitats in Europe and the World. There is plenty of monoculture agricultural land suitable for renewable energy developments which would be better suited and have a more manageable cost in terms of habitat.

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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.

Your Sincerely,

A handwritten signature in black ink that reads "Tristram Whyte". The signature is written in a cursive style with a large initial 'T'.

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

References

IUCN Peatland Programme, Use of Peat Depth Criteria: Accounting or the Lost Peatlands, June 2023.