

File With

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SECTION 131 FORM

Appeal No

ABP- 319218-24

Defer Re O/H

[Empty box]

Having considered the contents of the submission dated/received 22/4/24 from Irish Peatland Conservation Council I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

No new material planning issues - Board to consider same.

Section 131 not to be invoked at this stage.

[Checked box]

Section 131 to be invoked — allow 2/4 weeks for reply.

[Empty box]

Signed

Daniel O'Connor

EO

Date

5/6/24

Signed

[Empty box]

SEO/SAO

Date

[Empty box]

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

[Empty box]

Task No

[Empty box]

Allow 2/3/4 weeks

BP

Signed

[Empty box]

EO

Date

[Empty box]

Signed

[Empty box]

AA

Date

[Empty box]

✓ S440 Am. - Dan Wickham 26/04/24.



Planning Appeal Online Observation

Online Reference
NPA-OBS-003394

Online Observation Details

Contact Name Tristram Whyte	Lodgement Date 22/04/2024 14:48:08	Case Number / Description 319218
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Payment Details

Payment Method Online Payment	Cardholder Name I.P. C.C.	Payment Amount €50.00
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Processing Section

S.131 Consideration Required

Yes — See attached 131 Form

N/A — Invalid

Signed

Daniel O'Connor

Date

25/4/24

EO

S440 amended to observer

Fee Refund Requisition

Please Arrange a Refund of Fee of

€ *50*

Lodgement No

LDG-071540-24

Reason for Refund

Observations for this case are free of charge

Documents Returned to Observer

Yes No

Request Emailed to Senior Executive Officer for Approval

Yes No

Signed

Daniel O'Connor

Date

25/4/24

EO

Finance Section

Payment Reference

ch_3P8NE4B1CW0EN5FC1sYtLzDx

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

Authorised By (2)

SEO (Finance)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date



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

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An Bord Pleanála
64 Marlborough Street
Dublín 1
D01 V902

22nd April 2024

RE:Observation on QD09.319218

Dear An Bord Pleanála,

The Irish Peatland Conservation Council (IPCC) would like to make an **Observation** on Case Number **QD09.319218**.

The Environmental Impact Assessment and Natura Impact Statement accompanying this application for leave to apply for substitute consent fail to identify or discuss possible pollution impacts from Nitrogen deposition (aerial, groundwater and surface runoff) to Red Bog SAC. It has been highlighted to the Irish Peatland Conservation Council that nitrogen is becoming an issue for designated sites. In 2018 in the UK 39 of 57 Special Areas of Conservation listed on the APIS website (<http://www.apis.ac.uk>) exceeded the Critical Load Threshold for nitrogen. This is having negative impacts on the vegetation of the designated habitats. There are various sources of excess nitrogen such as construction (e.g. roads, developments, quarries) and can enter a habitat via wet or dry deposition.

Red Bog SAC (Sitecode:-000397) has been designated because it holds an example of Transition Mire (EU Habitat 7140), a rare peat forming habitat, which County Kildare only has two examples of. The IPCC would like it noted that in "The Status of EU Protected Habitats and Species in Ireland - Habitat Assessments - Volume 2 2019" for transition mire, "The Kildare County Wetland Survey reported on two out of two transition mire sites which were in 'not good' condition, and lists issues relating to drainage, pollution and grazing as being the main pressures at these sites". This highlights that damage to Red Bog has already occurred which goes against the Conservation Objectives of the SAC and all must be done to reverse this, including managing the impacts of the surrounding environment and developments.

The IPCC are not convinced that there has been no hydrological connectivity between the surrounding quarries and the designated site and the true impacts need to be ascertained. The IPCC would also like to highlight that the National Parks and Wildlife Service Site Synopsis for Red Bog SAC lists gravel extraction and drainage as ongoing threats.

The quarrying activities surrounding the SAC would further increase risks to the conservation of transition mire if expanded and this goes against Ireland's international, national and local legal obligations to protect this habitat.

Thank you for taking the time to read through our concerns.

Yours Sincerely,

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

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, Mathijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland, Kathrine Geoghegan
Tina Claffey, Monty Don OBE, Helen Conneely.

