

Kenneth O'Neill
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6th May 2025

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Ireland.

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
07 MAY 2025	
Fee: €	Type: _____
Time: <u>8.59</u>	By: <u>Raj Patel</u>

Re: Objection to Substitute Consent Application by Bord na Móna for Derryadd Bog, County Longford (Case Ref: SU14.322204)

Dear Sir/Madam,

I wish to lodge an objection to the application by Bord na Móna for substitute consent relating to historic peat extraction and associated development activities at Derryadd Bog and other sites in County Longford.

This objection is based on the following grounds:

1. Serious Environmental Damage:

The works undertaken — including drainage, surface alteration, and infrastructure development — have caused substantial and irreversible environmental damage. This includes:

- Destruction of rare raised bog habitat, protected under the EU Habitats Directive.
- Severe alteration of hydrology, with regional effects on wetlands and watercourses.
- Release of significant quantities of carbon dioxide through peat oxidation, undermining Ireland's climate commitments.

2. Negative Impact on Protected Bird Species:

Derryadd Bog forms part of an important sanctuary for migratory and resident birdlife, including the internationally protected Whooper Swan (*Cygnus cygnus*).

The destruction of habitat and disturbance caused by unassessed peat extraction activities has had and continues to have a detrimental effect on these populations, breaching Ireland's obligations under the EU Birds Directive.

3. Failure to Comply with EU Environmental Law:

The activities in question appear to have been carried out without appropriate Environmental Impact Assessment (EIA) or Appropriate Assessment (AA) as required under EU law. Retrospective substitute consent undermines the preventative purpose of these assessments and fails to restore the environmental integrity of the site.

4. Precedent for Future Development Pressure:

Granting substitute consent risks facilitating further inappropriate development, such as the proposed wind farm project at Derryadd Bog, without fully restoring or protecting the damaged ecosystem.

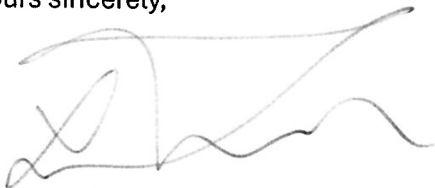
This cumulative impact, particularly on protected bird species and hydrological systems, must be fully and properly assessed before any new consents are granted.

Conclusion:

Given the significant environmental degradation already caused, the international importance of the site for migratory bird species, and Ireland's legal obligations under EU environmental law, I respectfully submit that substitute consent should be refused.

Should the Board nonetheless consider granting consent, I request that a full and independent Environmental Impact Assessment and Appropriate Assessment be undertaken, with extensive public participation, before any final decision is made.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Kenneth O'Neill', with a stylized, flowing script.

Kenneth O'Neill

Objection to Substitute Consent for Derryadd Bog – Supporting Information

1. Historic Environmental Damage

- Drainage and surface disruption have led to the loss of active raised bog habitat, a priority habitat under Annex I of the EU Habitats Directive.
- Hydrological alterations affect not only the bog but downstream aquatic ecosystems.
- Carbon loss from peat oxidation undermines Ireland's climate action targets under the Paris Agreement and EU legislation.

2. Impact on Birdlife

- Whooper Swans and other migratory birds depend on the Derryadd area for roosting and feeding.
- Habitat degradation and ongoing disturbance significantly threaten these species, which are listed under Annex I of the EU Birds Directive and protected internationally through agreements like AEWA.

3. Breach of Environmental Law

- Under EU law (Directive 2011/92/EU and 92/43/EEC), projects likely to have significant environmental effects must undergo EIA and/or AA before being allowed to proceed. This did not happen for the activities now seeking substitute consent.
- Retrospective assessment undermines the spirit and objectives of the legislation.

4. Future Development Concerns

- Proposals to develop a wind farm on Derryadd Bog present additional risks:
 - Increased bird collision mortality.
 - Further habitat fragmentation and disturbance.
 - Cumulative environmental degradation across the region.

5. Recommendations

- Refusal of substitute consent for the historic activities at Derryadd Bog.
- Mandatory environmental restoration and hydrological rehabilitation.
- Independent ecological surveys to assess the current state of the bog and its bird populations before any future development applications.