



# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

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An Bord Pleanála

64 Marlborough Street

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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  
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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.

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