

An Bord Pleanála
Meath Section
Marlborough Street
Dublin 1
D01V902

Date: 30/08/19

AN BORD PLEANÁLA	
LDG-	018825-19
ABP-	
02 SEP 2019	
Fee: €	220
Type:	Postal Order
Time:	
By:	Reg.

RE: Application for determination under S5 of the Planning and Development Acts 2000 – 2018 (KAS51942)

My name is Patrick Moran. I live at Sillogue, Kilberry, Navan, Co. Meath. On the 29th of July, 2019 I applied for a determination under S5 of the Planning and Development Acts 2000 – 2018 (KAS51942) as regards Drainage of wetland habitat (Raised Bog) and mechanical disturbance, extrusion of peat and removal of turf from a site at Drakerath, Wilkinstown, Co. Meath. On the 29th August I received a letter from Meath Co. Council informing me that Meath Co. Council had failed to deal with the application within the appropriate time frame and that should I wish I could refer the matter to An Bord Pleanála.

My application concerns an area of raised bog habitat (I am principal ecologist with FERS Ltd, an environmental consultancy) occurring at Drakerath, Wilkinstown, Co. Meath. Raised bog is a wetland habitat¹. Approximately 84% of Ireland's raised bog habitat has been affected by peat extraction, having implications for both climate and biodiversity². The site in question comprises approximately 88Ha (in total including areas of cutaway) wetland of high biodiversity value (and a regionally important carbon sink) that is being drained (the drain network discharges to the River Blackwater, a component of the River Boyne and River Blackwater Special Area of Conservation) and from which peat is being extracted by persons unknown. This development and similar developments nationwide are contributing to the climate and biodiversity emergency declared by the government. The development includes drainage of a wetland habitat (total area 88 ha approximately) where in excess of 2 ha of wetland habitat is being affected (cf 1 (c) part (2) schedule 5 of the planning and development regulations (as amended) 2001). This activity is having a significant impact on the environment. Even if considered sub-threshold, the impact on the environment of the development should require at minimum EIA screening in accordance with the planning and development regulations (as amended) 2001. The discharge of drains to the River Blackwater should, at minimum, require Appropriate Assessment screening.

Given the recent declaration of a "Climate and Biodiversity Emergency", the threats of An Taoiseach that Ireland will vote against the controversial Mercosur trade agreement unless Brazil takes steps to protect the Amazon and the recent publication in Nature³ that has illustrated that the upward change in mean annual flood discharge per decade (%) in Ireland during the period 1960 – 2010 has been driven by increasing rainfall and soil moisture, I would urge An Bord Pleanála to comprehensively

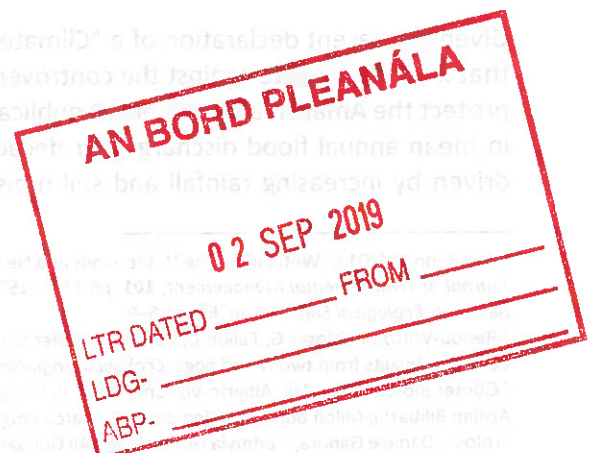
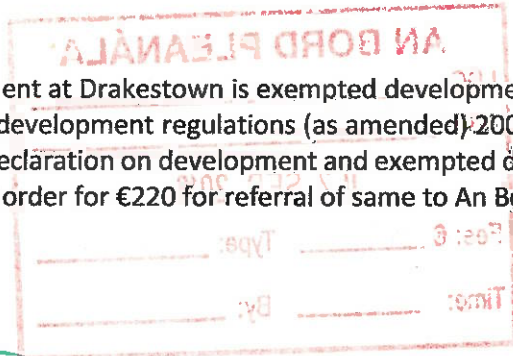
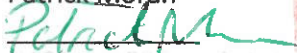
¹ Van Roon M (2012). Wetlands in the Netherlands and New Zealand: Optimising biodiversity and carbon sequestration during urbanisation. *Journal of Environmental Management*, **101**, pp 143 – 150; Verhoeven J (2014). Wetlands in Europe: Perspectives for restoration of a lost paradise. *Ecological Engineering*, **66**, pp 6–9.

² Renou-Wilson F, Moser G, Fallon D, Farrell C, Müller C and Wilson D (2019). Rewetting degraded peatlands for climate and biodiversity benefits: Results from two raised bogs. *Ecological Engineering*, **127**, pp 547–560.

³ Günter Blöschl, Julia Hall, Alberto Viglione, Rui A. P. Perdigão, Juraj Parajka, Bruno Merz, David Lun, Berit Arheimer, Giuseppe T. Aronica, Ardian Bilbashi, Miloš Boháč, Ognjen Bonacci, Marco Borga, Ivan Čanjevac, Attilio Castellarin, Giovanni B. Chirico, Pierluigi Claps, Natalia Frolova, Daniele Ganora, Liudmyla Gorbachova, Ali Gül, Jamie Hannaford, Shaun Harrigan, Maria Kireeva, Andrea Kiss, Thomas R. Kjeldsen, Silvia Kohnová, Jarkko J. Koskela, Ondrej Ledvinka, Neil Macdonald, Maria Mavrova-Guirguinova, Luis Mediero, Ralf Merz, Peter Molnar, Alberto Montanari, Conor Murphy, Marzena Osuch, Valeryia Ovcharuk, Ivan Radevski, José L. Salinas, Eric Sauquet, Mojca Šraj, Jan Szolgay, Elena Volpi, Donna Wilson, Klodian Zaimi & Nenad Živković (2019). Changing climate both increases and decreases European river floods. *Nature*, DOI <https://doi.org/10.1038/s41586-019-1495-6>

assess if the development at Drakestown is exempted development in view of 1 (c) part (2) schedule 5 of the planning and development regulations (as amended) 2001. Please find attached copy of the Application form for Declaration on development and exempted development as submitted to Meath Co. Council and postal order for €220 for referral of same to An Bord Pleanála.

Signed
Patrick Moran



Chairle Chontae na Mí

Roinn Pleanáil,
Teach Buvinda, Bóthar Átha Cliath,
An Uaimh, Contae na Mí, C15 Y291
Fón: 046 – 9097500/Fax: 046 – 9097001
R-phost: planning@meathcoco.ie
Web: www.meath.ie



Meath County Council

Planning Department
Buvinda House, Dublin Road,
Navan, Co. Meath, C15 Y291
Tel: 046 – 9097500/Fax: 046 – 9097001
E-mail: planning@meathcoco.ie
Web: www.meath.ie

Mr. Patrick Moran,
Sillogue,
Kilberry,
Navan,
Co. Meath.

Our Ref: ML / SC
Date: 28/08/2019

Re: Application for determination under S5 of the Planning & Development Acts 2000 – 2018 – KAS51942

Dear Sir,

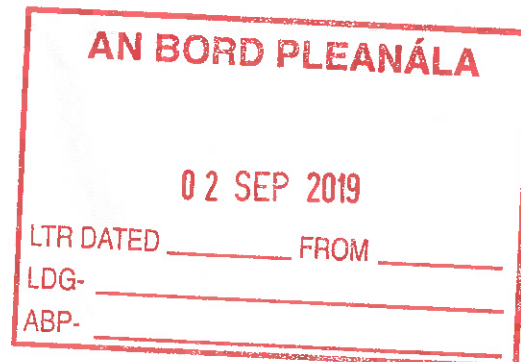
I refer to your application for a declaration on development & exempted development lodged with the Planning Authority on 29th July, 2019. Meath County Council failed to deal with the application within the appropriate timeframe, ie. on or before 25th August, 2019. You can refer the application to An Bord Pleanála under Section 5(3)(b) of the Planning & Development Acts.

The referral must be done within 4 weeks from the date the decision was due, which was 25th August, 2019.

A refund of €80 will be made by contacting this office and giving card details.

Yours Sincerely,

Sean Clarke,
Senior Executive Officer.



APPLICATION FORM – DECLARATION ON DEVELOPMENT & EXEMPTED DEVELOPMENT

Part 1 Section 5 of Planning and Development Act 2000-2014, as amended.

1. Name: PATRICK MORAN

Address: SILLOGUE, KILBERRY, NAVAN, CO MEATH

Phone No: 0877573121 E-mail : dr_patmoran@eircom.net

2. Address for correspondence:

Address: SILLOGUE, KILBERRY, NAVAN, CO MEATH

Phone No: 087 7573121 E-Mail: dr_patmoran@eircom.net

3. Location of Development and/or Subject Site:

DRAKERATH, WILKINSTOWN

4. Description of Development:

DRAINAGE OF WETLAND (RAISED BOG) AND MECHANICAL DISTURBANCE, EXTRUSION OF PEAT AND REMOVAL OF TURF. AREA IS SUBJECT TO TURBARY.

5. Will the development take place within the curtilage of a dwelling house?

Please tick as appropriate: YES NO

6. Will / does development take place in / on a Protected Structure or within the curtilage of a Protected Structure?

Please tick as appropriate: YES NO

6(b) If "YES", has a Declaration under Section 57 of the Planning & Development Act 2000 – 2014, as amended, been requested or issued for the property by the Planning Authority?

Please tick as appropriate: YES NO

6. State overall height of structure if applicable:

NOT APPLICABLE

8. State in square metres the floor area of the proposed development:

NOT APPLICABLE

AN BORD PLEANÁLA

02 SEP 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

9. List of plans / drawings etc. submitted:
MAPS OUTLINING AREA IN WHICH POTENTIAL UNAUTHORISED DEVELOPMENT IS TAKING PLACE.

AERIAL PHOTOGRAPH ILLUSTRATING POTENTIAL UNAUTHORISED DEVELOPMENT INCLUDING DRAINAGE OF A WETLAND HABITAT (TOTAL AREA 88 HA APPROXIMATELY) WHERE IN EXCESS OF 2 HA OF WETLAND HABITAT IS BEING AFFECTED (CF 1 (C) PART (2) SCHEDULE 5 OF THE PLANNING AND DEVELOPMENT REGULATIONS (AS AMENDED) 2001).

10. Please state applicants interest in this site
THIS A WETLAND SITE OF HIGH BIODIVERSITY VALUE THAT IS BEING DRAINED AND FROM WHICH PEAT IS BEING EXTRACTED BY PERSONS UNKNOWN. THIS DEVELOPMENT AND SIMILAR DEVELOPMENTS NATIONWIDE ARE CONTRIBUTING TO THE CLIMATE AND BIODIVERSITY EMERGENCY DECLARED BY THE GOVERNMENT. THIS ACTIVITY IS HAVING A SIGNIFICANT IMPACT ON THE ENVIRONMENT. EVEN IF CONSIDERED SUB-THRESHOLD, THE IMPACT ON THE ENVIRONMENT OF THE DEVELOPMENT SHOULD REQUIRE AT MINIMUM EIAR SCREENING IN ACCORDANCE WITH THE PLANNING AND DEVELOPMENT REGULATIONS (AS AMENDED) 2001.

If applicant is not the owner of site, please provide name & address of owner:
MUCH OF THE SITE IS OWNED BY COILLTE

11. Are you aware of any enforcement proceedings connected to this site?

Please tick as appropriate: YES NO

11 (b), If "YES" please supply details:

12. Are you aware of any previous planning application/s on this site?

Please tick as appropriate: YES NO

12 (b), If "YES" please supply details:

SIGNED: _____ DATE: _____

Stamp area with faint text: LTR DATED, LDG, ABP, and a date stamp 02 SEP 2019.

AN BORD PLEANÁLA
02 SEP 2019
LTR DATED _____ FROM _____
LDG- _____
ABP- _____

NOTES

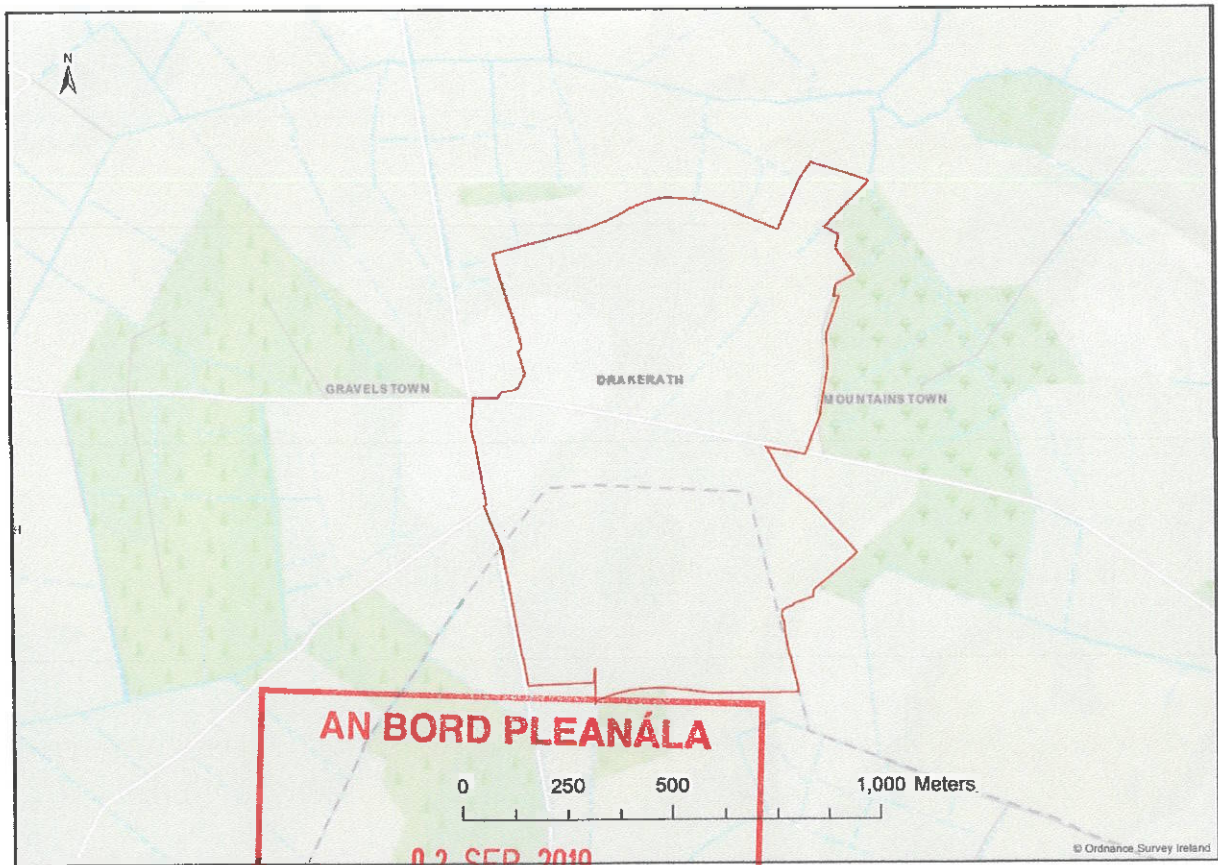
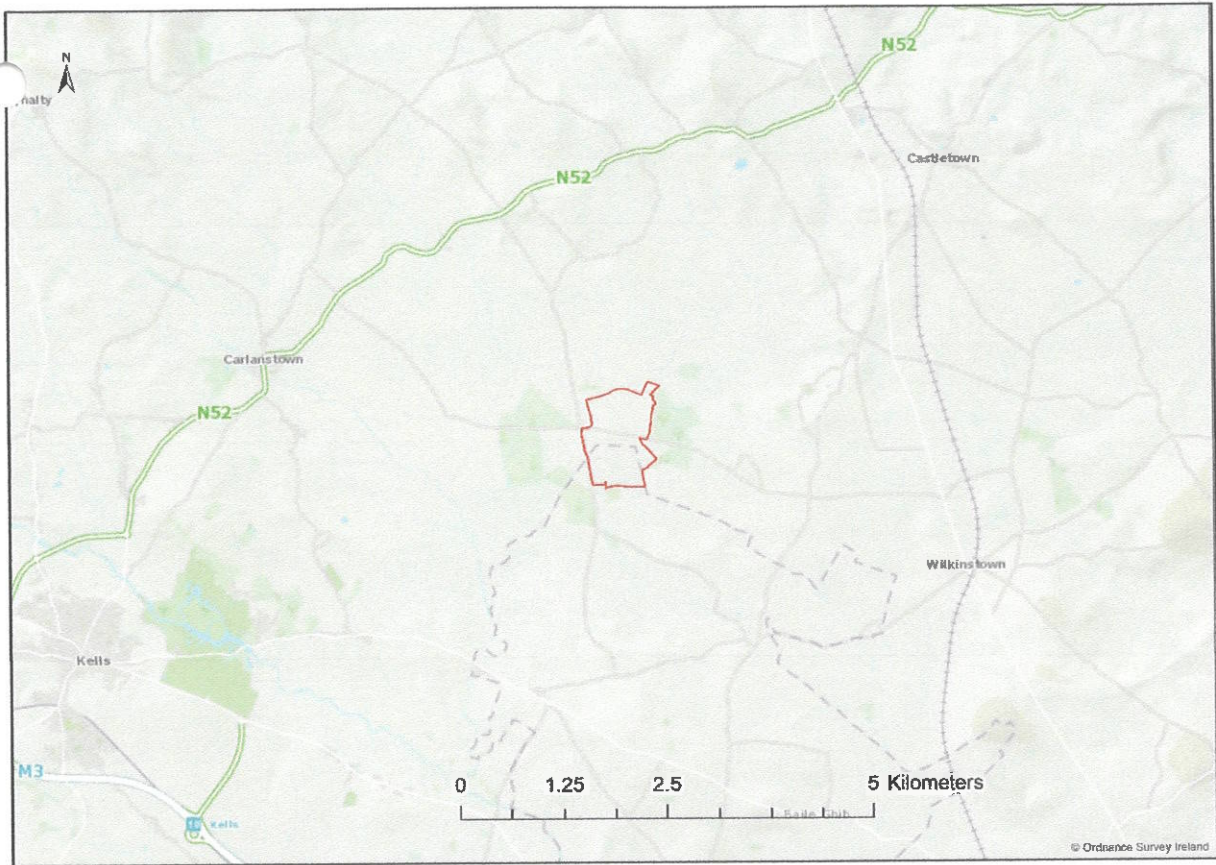
1. **Application Fee of €80**
2. **Application shall be accompanied by:**
 - **2 copies of site location map to scale 1:2500** clearly showing the site outlined in red and the extent of the site boundaries, the position of existing structures, etc., and the proposed work.
 - **2 drawings to scale (1:200)** of the proposed development (including floor plan and elevations), if appropriate.
 - **Two site layout plans to scale 1:500** if appropriate. Please submit 2 copies of any additional plans/reports etc. you may wish to include as part of the application.

Application shall be forwarded to: Meath County Council, Planning Department, Buvinda House, Dublin Road, Navan, Co. Meath.

Contact Details: Phone: 046 9097500 Fax: 046 9097001

Email: planning@meathcoco.ie

AN BORD PLEANÁLA	
02 SEP 2019	
LTR DATED _____	FROM _____
LDG- _____	
ABP- _____	



AN BORD PLEANÁLA

0 250 500 1,000 Meters

02 SEP 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____



Figure 1: SATELLITE IMAGERY OF SITE

AN BORD PLEANÁLA

02 SEP 2019

LTR DATED _____ FROM _____

LDG- _____

ABP- _____



Figure 1: DRAINAGE AND PEAT REMOVAL FROM NORTHERN SECTION OF BOG



Figure 2: DRAINAGE AND PEAT REMOVAL FROM SOUTHERN SECTION OF BOG

AN BORD PLEANÁLA

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