



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133
e-mail/riomhphost: bogs@ipcc.ie web/idirlíon: www.ipcc.ie

WEDG Review Submissions
Planning Policy and Legislation Section
Department of Housing, Planning and Local Government
Custom House
Dublin 1
D01 W6X0
WEDGReview@housing.gov.ie

18th February 2020

RE: Draft Wind Energy Guidelines Public Consultation 2020

Dear Sir/Madam,

The Irish Peatland Conservation Council (IPCC) are a registered environmental charity that aims to protect a representative sample of Irish Peatlands for present and future generations to enjoy. Peatland has been seriously diminished in the Republic of Ireland with the original extent of ~1.2 million hectares being reduced to just 17.9% (Foss, O'Connell, Crushell, 2001). Blanket bog, specifically, has been reduced from an original expanse of 774,367ha to 166,115ha. This represents only 21.45% of blanket bog within the Republic left in a conservation worthy condition. These reductions in good intact peatland habitats represents a loss for Ireland's biodiversity and long term climate regulating potential through carbon sequestration. It is in this regard that the IPCC would like to make comments on the draft Wind Energy Guidelines document with the aim of strengthening policy in the area of peatland conservation.

We understand that areas of upland blanket bog are also target areas for windfarm developments because of the expansive landscape and the availability of suitable wind speeds which have a high potential to produce wind energy. This has led to many damaging activities occurring on blanket bog habitats including the construction of the associated road network across the peatland, service structures, drainage, soil conduits for power cabling, turbine foundations and electricity pylons. Construction of a new road through open habitat introduces a range of damaging occurrences such as the dumping of household waste, spread of invasive species, increased incidence of accidental fires, peat extraction or the placement of grazing stock. Dessication of the peat soil can occur and this disrupts the carbon accumulation process increasing the amount of CO₂ released to the atmosphere. Developments on peatland habitat fragment the landscape and affect the hydrological functioning, diminishing its carbon sequestration ability. This has implications for erosion and the adjoining waterways which suffer ecologically from the increased peat silt runoff and chemicals such as ammonia. While IPCC are not inherently opposed to windfarms or renewable energy they should not be constructed on one of the rarest habitats in Europe unless there is potential for restoration (as on cutaways/cutovers) or it can be unequivocally proven the construction will not damage the habitat or affect qualifying interests of protected sites. If sites were chosen more wisely designated nature reserves need not be strangled with developments which affect the behaviour and sensitivity of the wildlife or their natural surroundings.

39 out of 56 wind farms surveyed by the National Parks and Wildlife Service (NPWS) within The Status of EU Protected Habitats and Species (NPWS, 2007) were located on blanket bog, 20 of which were on relatively intact blanket bog, on many occasions wind farms have been constructed at the margins of designated nature reserves and threaten the conservation objectives of the protected site.

Within the IPCC Sites Database 30 Natural Heritage Areas and 18 Special Areas of Conservation are threatened or damaged by windfarms (see Tables 1 & 2 for details).

We have seen multiple times in Ireland where the conservation and qualifying interests of a protected site, such as Hen Harrier and its associated foraging habitat have been pushed aside due to the developer planning to mitigate the loss by attempting to replace the habitat elsewhere. This is unacceptable and it is ridiculous that developers should decide where Ireland's conservation efforts are targeted.

35 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*: Rachel Kavanagh

Directors/*Stiúrthóirí*: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail.

Patrons/*Pátrúnaí*: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ní Lamhna, Matthijs Schouten.

Furthermore, IPCC conducted a review of the work done to protect blanket bogs from wind farm developments over the 10 year period between 2007 and 2016. A report by Kirsty Paterson (2017) is provided in Appendix 1. This work concluded that the chief reasons for refusing planning permission for a windfarm on blanket bog habitat was water pollution, the presence of the Freshwater Pearl Mussel and the interest of sustainable development. The goal of protecting and conserving peatlands was never an issue. In addition the 2019 report published by the Department of Culture, Heritage and the Gaeltacht on the Status of EU Protected Habitats and Species highlighted the pressure of windfarm construction on reducing the quality of active blanket bog, a priority habitat Annexed within the EU Habitats and Birds Directive. IPCC wish you to take note of this fact and strengthen your guidelines appropriately.

IPCC see that recently the initial planning permissions granted for the earliest windfarms installed in Ireland are running out and the developers are now starting to apply for permission to upgrade the turbines with more efficient (and larger) structures. This is going to increase the footprint of windfarms as turbine hardstands increase in size. The construction activities of these upgrades have the potential to further damage the blanket bog habitat. IPCC have also seen occurrences where the visibility of windfarms have overridden the ecological sensitivity of peatland resulting in turbines being placed in the more intact sensitive areas, such as the Barnsmore Bog windfarm in County Donegal. It is regrettable that the impact of this particular windfarm which was developed on a site of conservation importance has never been measured since the day it was installed, a golden opportunity has been missed to collect data which could inform your windfarm guidelines and lead to best practice guidelines going forward. Please build habitat and species monitoring into all windfarm developments going forward.

Conclusion

Please take on board the need to protect blanket bog habitats from wind farm developments in your guidelines. Overall IPCC find that the draft Wind Energy Guidelines are placing too much emphasis on the developers and not enough on the protection of these habitats for example no monitoring is being undertaken on windfarms developed on blanket bog habitat. If a peatland needs to be drained for a development then the development is in the wrong place. If a windfarm is proposed on a designated site it is also in the wrong place. 90% of North Western Europe's wetlands have been drained and this has had an alarming outcome visible in the current climate catastrophe with flooding, increased rainfall, species extinctions and extreme weather. IPCC thank you for giving us the opportunity to comment the draft documents. We are willing to work with you on this issue and look forward to hearing from you.

Yours Faithfully,



Tristram Whyte -- Freshwater Biology B.Sc(hons)
Irish Peatland Conservation Council - Conservation Policy & Fundraising Officer

References

Bogs & Fens of Ireland Conservation Plan 2005, Foss, O'Connell, Crushell, 2001.
The Status of EU Protected Habitats and Species Volume 3, unpublished, National Parks and Wildlife Service, 2007.

Table 1

IPCC Sites DB 2020 SAC Damaged or Threatened by Windfarms			
NAME	County	Grid Ref	SAC Code
Caher Barnagh Mountain / Killarney NP	CK,Ky	W 190 870	365
Cuilcagh Mountains / Lough Cratty	Lm,Cn	H 150 270	584
Galtee Mountains	Ts	R 900 240	646
Laughil	So	G 480 230	2006
Lough Nabrickkeagh	So	G 420 150	634
Owenduff Bog	Mo	F 860 070	534
Pettigo Plateau / Dunragh Loughs	DI	H 020 740	1125
Roundstone / Errisbeg	G	L 710 450	2034
Shralahy	Mo	G 000 300	542
Ballin Lough / Slieve Aughty	G	M 700 040	1229
Lough Hoe	Mo,So	G 370 140	633
Glendree	Ce	R 510 880	1912
Tullytresna	DI	C 060 030	1870
Barleart, Lackagh, Boleybrack Mountain	Lm	G 940 350	2032
Arroo Mountain	Lm	G 83 52	1403
Slieve Bernagh Bog	Ce	R 64 75	2312
Killarney NP, MacGuillycuddy' Reeks and Caragh River	CK,Ky	W 190 870	365
Ox Mountains Bog	So	G 480 230	2006

Table 2

IPCC Sites DB 2020 NHA Damaged or Threatened by Windfarms			
NAME	County	Grid Ref	NHA Code
Aghavogil Bog	Lm	G 885, 505	2430
Arroo Mountain	Lm	G 83 52	1403
Ballin Lough / Slieve Aughty	G	M 700 040	1229
Bangor-Erris Bog	Mo	F 830 190	1473
Barleart, Lackagh, Boleybrack Mountain	Lm	G 940 350	2032
Barnesmore	DI	G 750 820	2375
Bleanbeg Bog	Tn	R 795 640	2450
Caher Barnagh Mountain / Killarney NP	CK,Ky	W 190 870	365
Carna Heath	G	L 794 320	1241
Corry Mountain Bog	Rn,Lm	G 915, 185	2321
Cragnashingaun Bogs	Ce	R 120 692	2400
Cuilcagh Mountains / Lough Cratty	Lm,Cn	H 150 270	584
Ederglen Bog	Mo	F 815, 280	2446
Galtee Mountains	Ts	R 900 240	646
Glendree	Ce	R 510 880	1912
Gortacullin Bog	Ce	R 555 705	2401
Inagh Bog	Mo	G 015, 360	2391
Laughil	So	G 480 230	2006
Lough Acrow Bogs	Ce	R 205 690	2421
Lough Hoe	Mo,So	G 370 140	633
Lough Nabrickkeagh	So	G 420 150	634
Moycullen Bogs	G	M 205, 280	2364
Owenduff Bog	Mo	F 860 070	534
Pettigo Plateau / Dunragh Loughs	DI	H 020 740	1125
Roundstone / Errisbeg	G	L 710 450	2034
Shralahy	Mo	G 000 300	542
Slieve Bernagh Bog	Ce	R 64 75	2312
Slieve Rushen	Cn	H 230 220	9
Tullytawen Bog	Rn	G 910 140	617
Tullytresna	DI	C 060 030	1870

Is the Peatland Pen Mightier Than the Sword?



Kirsty Paterson, a master's student in Global Change at University College Dublin, investigated the work done by IPCC to protect blanket bogs from windfarm developments over the last 10 years.

The growing awareness of climate change and the need to change our energy sources has stimulated the development of renewable energy sector globally. In the Republic of Ireland there is an overlap between the areas with the highest annual wind speeds and the occurrence of upland blanket bog habitat. While IPCC supports

the need to develop the renewable energy sector in an effort to combat climate change, it cannot support developments that result in destruction of peatlands. Windfarm development negatively impacts the integrity of peatlands. It provides access for other degrading activities such as dumping, drainage and turf

cutting. During construction carbon dioxide is released as the peat deposit is disturbed.

Since 2007, IPCC has carried out 87 separate actions across 70 sites regarding windfarm developments. These include responding to 53 scoping reports, 15 An Bord Pleanála actions and 19 county council objections (see table inset). In total 7 sites were saved from development. The longest running case was that of Knockranny in Co. Galway, which is highlighted in a case study inset.

The IPCC cannot respond to all of the scoping requests it receives, but will if there is a threat to peatlands of conservation importance. With regard to scoping responses, the IPCC receives no feedback on the information sent. I followed up with consultants to ascertain how the information was used. I discovered that observations made by the IPCC were deemed important in the progression of a

County Council Objections Total = 19	An Bord Pleanála Total = 15	Response to Scoping Reports Total = 53
10 granted permission	6 decision appeals	28 no record of application as of February 2017
5 withdrawn from planning	4 observations on cases	10 granted permission
2 refused permission	3 responses to further information request	9 unclear as these were recent responses and planning may be applied for in the future
2 unclear as made in Northern Ireland	2 objections on Strategic Infrastructure Development cases, both refused permission.	5 refused permission
		1 withdrawn from planning

project particularly in designing the field surveys. However, no site specific information relating to IPCC submissions was forthcoming.

Steps in Casework

When carrying out casework a checklist is followed to investigate all aspects of a development (see inset). Following this comprehensive checklist ensures the protection of peatlands and allows for other concerns to be raised.

Moving Forward

The IPCC now requests feedback on responses to scoping reports and has set up a 30 day reminder system to follow up on submissions.

Conclusion

This investigation was necessary, as the IPCC has not had the time to follow up on its casework. Most of the reasons for refusing planning permission tend to be un-related to the goal of protecting peatlands of conservation importance. Water pollution and the presence of the freshwater pearl mussel provide the strongest case for

IPCC Casework Checklist

1. Check satellite map of physical landscape.
2. Check the roadmap of site location.
3. Check site location against SAC, SPA, NHA and pNHA maps.
4. Check for designations neighbouring the site.
5. Check for red listed species from the IPCC's database for the area.
6. Check archaeology.ie map for recoded monuments at the site.
7. Check the bats indicative map.
8. Check the SEAI wind energy indicative map.
9. Check the IPCC frog database.
10. Look up relevant published reports on the development issue.
11. Check the IPCC action plan to assess peatland resources in the county.
12. Check the plans against the county development and biodiversity plans.
13. Check the Census for bird and mammal species in the site.

planning refusals and to a lesser extent the "interests of sustainable development". Thus information provided by the IPCC may lead to project redesigns or the decision not to pursue a project further. Hopefully requesting or conducting a follow up within a shorter timeframe will bring this information to light. It is undeniable that every submission, observation or objection is essential in reminding environmental consultants and planners of the importance of peatlands and the need to conserve this special landscape. - **Kirsty Paterson**

Thank You

IPCC would like to thank our friends of the bog for supporting site casework through their membership subscriptions.

We also wish to thank Kirsty and University College Dublin for allowing her to work with us on a placement and carry out this investigation.

Case Study: Knockranny Wind Farm, Galway

In 2010 the IPCC received a scoping request for a 16 turbine windfarm at Knockranny, Galway, little did they know the case would undergo a high court judicial review by 2016. The IPCC highlighted their concerns and said they would oppose the development. Planning permission was sought in August 2011 with a revised design of 14 turbines. True to their word the IPCC made an objection to Galway County Council highlighting 3 key concerns;

1. The proximity to Connemara Bog Complex SAC.
2. The impact on the protected monument on Knockranny Hill.
3. The proposals' contradiction of the Galway County Biodiversity Plan which highlights the value of peatlands.

Conditional permission was granted, which was quickly

appealed to An Bord Pleanála by a third party. The IPCC submitted an observation in support of the appeal. The proposal was rejected in August 2012, but the possibility of a windfarm on the site was not ruled out. An Bord Pleanála were not satisfied that the risks of peat slippage had been fully resolved. Additionally, it was felt that the existing design would be detrimental to the archaeological and cultural heritage of the area.

In 2013 the process began again this time under the name Cnoc Raithní. The proposal design was reduced to 11 turbines. Despite the changes the IPCC sent an objection as the issues with the previous proposal remained unresolved. Once again Galway County Council gave conditional permission in early 2014, which the IPCC appealed to An Bord Pleanála. Permission was granted in February 2016, however the result has now

been brought to a high court judicial review on the basis of inadequacies of the Appropriate and Environmental Impact Assessments, Irish Language issues and that the decision was irrational with respect to previous planning refusals.



Above: Proposed location of Knockranny windfarm. Source: Google Maps, 2017.