



# 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

**Kerry CDP Review  
Planning Policy Unit  
Kerry County Council  
County Buildings  
Rathass  
Tralee  
Co. Kerry  
planpolicy@kerrycoco.ie**

**27th July 2020**

## **RE: Review of County Development Plan**

Dear Kerry County Council,

Thank you for your email notifying The Irish Peatland Conservation Council of the current review of the Kerry County Development Plan 2015-2021 that opened for public consultation on the 26th of June 2020. The big issues concerning IPCC are documented in this submission.

The Irish Peatland Conservation Council (IPCC) campaign and raise awareness for the protection of a representative sample and the sustainable use of Irish Peatlands. Ireland's move to a green economy goes hand in hand with the carbon sequestration and storage function potential of the country's peatlands. Unfortunately due to economic and cultural reasons peatlands have come very close to extinction, evident by the biodiversity crisis currently visible throughout numerous reports on the status of our rare habitats and species - such as the native iconic Curlew, of which the population has been reduced to just ~120 pairs - this is a loss of 96% in 30 years (Lewis, Burke, Fitzgerald, Tierney, Kelly, 2019). It is in this regard that we would like to respond to the Review of the County Development Plan Stage 1 Consultation.

### **Loss of Peat Habitat**

Once, County Kerry supported 96,864ha of peatland (Hammond, 1979), the majority of which was blanket bog. In the Bog and Fens of Ireland Conservation Plan 2005 published by IPCC in 2001 it was determined that the peatlands of County Kerry had been reduced to just 12.9% of the original geographic distribution (Foss, O'Connell, Crushell, 2001). The peatlands that remain in the county needs to be given full protection yet there are a number of issues that hinder this.

### **Fragmentation**

Fragmentation of peatland is a major concern. Ireland is rushing to meet its clean energy targets through the installation of windfarms and their associated infrastructure (e.g. access roads and electricity connections). Windfarms should not be given planning permission within ANNEX I Habitat (EU Habitats Directive) which includes active peat forming habitat. Blanket Bog habitat in Ireland has been assessed by The National Parks & Wildlife Service in 2019 as having an over-all status of "BAD" due to the increased degradation of structure and function. (NPWS, 2019). The EU Commission has singled Ireland out for not properly implementing the Environmental Impact Assessment Directives in regards to peatland and IPCC do not accept that allowing developments on one of the rarest habitats in Europe, one that is at risk of extinction, is a sensible use of the peatland resource.

Windfarms are not the only cause of fragmentation on peatland. Road infrastructure for transport is also becoming an issue as the population increases along with the number of road users. We ask the Council, going into the future, to improve public transport and promote the use of alternative travel methods in a socially inclusive way rather than increasing the road network which is putting pressure on - and reducing the ecological integrity of - internationally important carbon stores and biodiversity. Peatland protection should feed in to all aspects of planning policy or this habitat will become extinct.

### **Catchment Management**

Many of the river catchments in Kerry are peat based. Ecologically disrupted peatlands can lower water quality as peat sediment, released by erosion, causes eutrophication, heightens biological oxygen demand and silts up river beds. This has impacts on rare species such as the Pearl Mussel which requires pristine water quality. Poorly planned developments can also cause bog-bursts and peat-slippage killing aquatic and terrestrial wildlife which, when it happens, is an environmental disaster. It has also become evident that peat erosion causes pressure on residential water supply as chemicals have to be introduced to remove the peat from the water. Ireland has been put on a 3 month notice by the EU Commission for using levels of these chemicals which has been deemed un-safe by the World Health Organisation - highlighting the amount of

## **35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

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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: Rachel Kavanagh

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

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peat that is actually entering our water. Solving this problem at the source i.e. the peatlands, has to be the best answer. Improving the ecological functioning and managing the landscape in river catchments in a sensitive manner is the way forward and IPCC ask Kerry County Council to introduce policies that help and promote not only the sustainable use but also restoration of peatland. This would benefit the county immensely as it would increase the area available for rare and red listed species such as the Hen Harrier but also provide the amenity backdrop for a sustainable tourism based industry which County Kerry already succeeds in.

### **Nitrogen Deposition**

Nitrogen deposition has been identified as a serious concern within Special Areas of Conservation in the UK where it has been measured to be higher than the critical load that designated sites and species can tolerate ([www.apis.ac.uk/srcl/](http://www.apis.ac.uk/srcl/)). The increased nitrogen loads have been linked to new housing developments, roads, intensive agriculture and urban wastewater. This should be monitored in County Kerry and appropriate measures must be put in place - including strengthening planning policy so as to ensure that developments are not going to be detrimental to any designated site through increased nitrogen deposition.

### **Housing**

Another concern that IPCC would have for the County Development Plan is the control of one-off housing across the county. A good case-study in this regard is the expansion of Killarney Town and the encroachment of housing into the catchment area of Sheheree Bog National Nature Reserve (located South East of Killarney). The County Development Plan needs to control housing development moving away from linear roadside properties and encourage renewal within urban areas in the interest of preserving the landscape character and nature of the county.

### **Carbon Accounting**

It has become increasingly clear that the eco-system services of peatlands are of great value, such as the carbon that is removed from the atmosphere and stored within them due to Ireland's climatic conditions. Peatlands have been a major part of the global carbon cycle for many thousands of years locking the carbon away and reducing greenhouse gases available in the atmosphere. Kerry County Council need to create a program to measure how much carbon is stored in the county's peatlands and use this as a baseline for future monitoring and to measure the success of restoration projects. Such an action would be in-line with carbon accounting under LULUCF which is expected to be brought into force in 2021 by the new Green Government and not 2026 as originally planned. This data could permeate into other research programmes undertaken. For example, the county could engage in a project to assess the condition of its carbon stores and this would help inform future policy creation for the county.

The IPCC thank you for allowing us to feed our concerns into this review of the development plan and we are available to discuss these matters at your convenience.

Yours Faithfully,



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

### References

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Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10 - 2015/16, Lesely Lewis, Brian Burke, Niamh Fitzgerald and Seán Kelly, National Parks & Wildlife Service, 2019.

The Peatlands of Ireland, R.F. Hammond, 1979.

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