



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA hÉIREANN

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Fergus O'Dowd
Committee of Transport, Tourism & Sport
1 Leyland Place
Stockwell Street
Drogheda
Co. Louth

17th September 2019

RE: Ardee Bog - Bypass Review 18th September 2019

Dear Mr O'Dowd,

The IPCC are aware there will be a meeting taking place on the 18th September 2019 between the Committee of Transport, Tourism and Sport, Transport Infrastructure Ireland and Louth County Council with the Ardee Bypass on the agenda.

IPCC would like to reiterate the importance of Ardee Bog as a wildlife stronghold and community amenity area. This cutaway raised bog, while not formally designated was put forward as a Natural Heritage Area, and is still a proposed Natural Heritage Area. The bog has been out of peat production for some time and this can be seen from the pNHA NPWS Site Synopsis (attached) which states that there are wet pools with *Sphagnum* and Bogbean present. This would highlight that the bog is in a reforming stage with many plant species typical of raised bog.

Ardee Bog is the most easterly raised bog in the Republic and this is important as it increases the distribution range in terms of the E.U. Habitats Directive. As Raised Bogs are an ANNEX I habitat, Ireland has to report on their status every 6 years. Due to the ongoing pressures on this hydrologically dependant habitat we have had to declare Raised Bogs as BAD in all categories which included "Geographic Range", "Area", "Structure & Functions", "Future Prospects" and their "Overall Status" (screenshots attached). By allowing a road to be built through this rare biodiverse wildlife refuge we will be deteriorating the condition of raised bogs nationally even more. Ardee Bog would become another victim of "death by a thousand cuts" and Ireland would have to pay hefty fines for not suitably managing our environmental resources.

Ireland has officially declared that we are living in a Climate Crisis and the idea that we would detrimentally affect the hydrologically preserved carbon resource stored within Ardee Bog goes against all other efforts to reduce our impact on the environment.

If the proposed Ardee Bypass is to be a long-term project then it needs to be mindful of the long-term impacts it will have on the environment (as all developments should) and all that the bog provides to people and wildlife. As Curlew are returning to Ardee Bog it should be a reminder that these cutaways are important in terms of supporting Ireland's native species, some of which, such as the Curlew, are on the brink of extinction.

Thank you for taking the time to read through our concerns and IPCC hope that all present at the table be thoughtful for our native habitats which need to be protected for all present and future generations.

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

35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity No/Uimhir Carthanacht: CHY6829 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,

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Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

SITE SYNOPSIS

SITE NAME: ARDEE CUTAWAY BOG

SITE CODE: 001454

This site is a cutaway raised bog, situated 3km west of Ardee in Co. Louth.

The site supports a mosaic of bog and heath vegetation, with such species as Heather (*Calluna vulgaris*), Round-leaved Sundew (*Drosera rotundifolia*), Tormential (*Potentilla erecta*), Bottle Sedge (*Carex rostrata*), Purple Moor-grass (*Molinia caerulea*), Bracken (*Pteridium aquilinum*), Devil's-bit Scabious (*Succisa pratensis*), Royal Fern (*Osmunda regalis*), milkwort (*Polygala* spp.), Heath Wood-rush (*Luzula multiflora*) and Rosebay Willowherb (*Chamerion angustifolium*) occurring. Channels and wet pools on the site support Bogbean (*Menyanthes trifoliata*).

A notable feature of the site is the presence of areas where bog mosses (*Sphagnum* spp.) and cottongrasses (*Eriophorum* spp.) occur abundantly. An area of birch (*Betula* spp.) scrub occurs on the eastern side of the site.

2019 Article 17 Report on Ireland's Raised Bogs (E.U. Habitats Directive, full report available www.npws.ie)

10 Conclusions	
Assessment of conservation status at end of reporting period	
10.1 Range	Favourable (FV) / Inadequate (U1) / Bad (U2) / Unknown (XX)
10.2 Area	Favourable (FV) / Inadequate (U1) / Bad (U2) / Unknown (XX)
10.3 Specific structure and functions (incl. typical species)	Favourable (FV) / Inadequate (U1) / Bad (U2) / Unknown (XX)
10.4 Future prospects	Favourable (FV) / Inadequate (U1) / Bad (U2) / Unknown (XX)
10.5 Overall assessment of Conservation Status	Favourable (FV) / Inadequate (U1) / Bad (U2) / Unknown (XX)
10.6 Overall trend in Conservation Status	Indicate the trend (qualifier) for FV, U1 and U2: improving / deteriorating / stable / unknown
10.7 Change and reasons for change in conservation status and conservation status trend	Indicate whether there is a change from the previous reporting round and (if yes) the nature of that change. More than one option (b to e) can be chosen.

7110 ACTIVE RAISED BOGS*

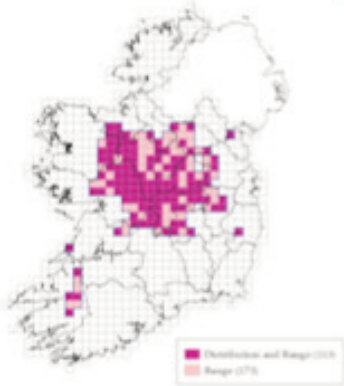
Raised bogs are accumulations of deep acid peat (3-12m) that originated in shallow lake basins or topographic depressions. They have a characteristic elevated surface or dome, which develops as **raised bogs** grow upwards from the surface. The bog dome is primarily rainwater-fed (ombrotrophic) and isolated from groundwater. This gives rise to acidic conditions deficient in plant nutrients, which in turn supports a distinctive suite of vegetation types. Although low in overall diversity, **raised bogs** support specialised plant assemblages dominated by a range of mosses of the genus *Sphagnum*. The bog surface in good condition supports a patterned micro-topography of pools, hummocks and lawns that provide a range of water regimes supporting different species assemblages. **Raised bogs** are more abundant in the lowlands of central and mid-west Ireland. In Ireland they are confined to areas with an annual rainfall below 1,250 mm and occur principally on land below 130m. They are classified into two sub-types: Western **raised bogs** (or Intermediate) and True Midland **raised bogs**.

Active **raised bog** is characterised by the presence of an acrotelm, which is the living, actively peat-forming upper layer whose surface is composed mainly of living bog mosses (*Sphagnum* spp.). Intact **raised bogs** are characterised by the presence of ericoid and sedge species and an abundance of *Sphagnum* species, amongst other mosses. Typical vascular plant species include bog-rosemary (*Andromeda polifolia*), bogbean (*Menyanthes trifoliata*), cottongrasses (*Eriophorum* spp.), cranberry (*Vaccinium oxycoccos*), cross-leaved heath (*Erica tetralix*), sundews (*Drosera* spp.) and white beak-sedge (*Rhynchospora alba*). Several species of *Cladonia* lichens are also frequent.

The main pressures on active **raised bog** are peat extraction, drainage, afforestation and burning. Climate change is also considered to pose a threat in the future. The Overall Status of the habitat is Bad and deteriorating, unchanged since the last assessment.



Fernando Fernandez



OVERALL STATUS: BAD ▼

7120 DEGRADED RAISED BOGS

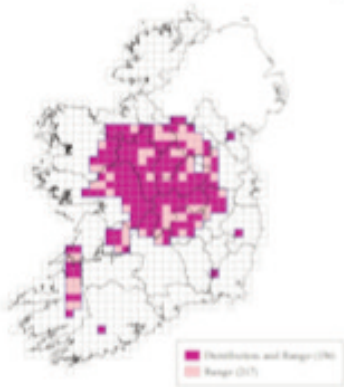
Raised bogs are accumulations of deep acid peat (3-12m) that originated in shallow lake basins or topographic depressions. As **raised bogs** grow upwards from the surface they typically develop an elevated dome, which is primarily rainwater-fed (ombrotrophic) and isolated from groundwater. This gives rise to a nutrient-deficient, acidic habitat, which supports a distinctive suite of specialised vegetation assemblages. **Raised bogs** are more abundant in the lowlands of central and mid-west Ireland. They are confined to areas with an annual rainfall below 1,250 mm, occurring principally on land below 130m.

Degraded **raised bog** is characterised by the complete absence (or patchy thin cover) of an acrotelm, which is the living, actively peat-forming upper layer. Previously, all the vegetated areas of high bog that were not delineated as active **raised bog** were defined as degraded **raised bog**, on the assumption that most of it could be restored to active peat-forming conditions after implementation of comprehensive restoration works. However, recent modelling techniques based on earlier research has allowed degraded **raised bog** to be delineated based on the premise that only areas with the right combination of physical conditions are ultimately capable of supporting active **raised bog** after restoration measures are implemented. To qualify as degraded **raised bog**, there must be a reasonable expectation that these areas are capable of natural regeneration to active bog within 30 years if their hydrology is repaired. The remainder of the high bog that is neither active nor degraded **raised bog** is now referred to as 'supporting **raised bog** habitat'.

The main pressures on Degraded **raised bog** come from peat extraction, drainage, afforestation and burning. Climate change is recognised as an additional threat in the future. As a result the Overall Status is assessed as Bad and deteriorating, unchanged since the last assessment.



Fernando Fernandez



OVERALL STATUS: BAD ▼