

TBR7 - Peat

Curraghinalt, Gortin

December 2025

Response to Transboundary Consultation Representations – [REDACTED] (SLR Consulting) & [REDACTED] ([REDACTED])

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
Response from Donegal County Council TB Consultation 9.5.25 – Pg 4-5	DCC discusses the experience of Meen Bog: 'The planning authority has its own experience of a catastrophic peat slippage event associated with a windfarm development at Meenbog in south Donegal which had significant environmental transboundary impacts and in this regard the planning authority asks the Commissioner to fully assess appropriate peat management...'	No	<p>The landslide at Meenbog occurred on open upland blanket bog and on afforested upland blanket bog on the 12 November 2020. A report summarising the findings of the Meen Bog failure is summarised in 'Assessment of Main Contributing Factors Leading to Three Major Peatland Failures In Leitrim, Kerry And Donegal' dated: 29/10/2024. The report was commissioned by the Geological Survey of Ireland (Department of the Environment, Climate and Communications) and National Parks and Wildlife Service (Department of Housing, Local Government & Heritage) in order to determine the main factors that led to three major landslides that occurred in 2020.</p> <p>The report concludes: <i>'The key trigger activity for the failure was the construction of a floating access road across blanket bog close to a convex break in slope, and directly downslope of an area of deep blanket bog with peat of very low shear strength'</i>.</p>

This incident cannot be compared to the proposed development at Curraghinalt in any respect. In particular:

- (i) The site setting is entirely different. The Meen Bog is a flat lying open blanket bog with deep catotelmic peat. In contrast, Curraghinalt has thin, predominantly acrotelmic peat and peat soils on a slope.
- (ii) The Meen Bog peat slide was caused by poor and unauthorised construction technique resulting in a bog burst of a large continuous deposit of deep and very weak catotelmic peat (up to 4.5m). In contrast, peat at the Curraghinalt infrastructure site is very fragmented / discontinuous, with all peat being completely excavated beneath proposed infrastructure.
- (iii) In particular, the Meen Bog site is only partly excavated, at Curraghinalt the peat is completely excavated, thereby removing any peat and eliminating peat slide risk.

Note, peat management is addressed in ES App B8, and peat slide risk assessment is provided in ES App B7 both of which are completed in accordance with industry guidance.

Response from Donegal County Council TB Consultation 9.5.25 - Pg 65-66 (Loughs Agency para 10.11)

DCC/Loughs Agency refer to a number of points made by Loughs Agency 23 April 2025, under paragraph 10.11): Yes

1. Further to this, the level of disruption to the environment that the mine site requires, and the disturbance of significant amounts of blanket bog, will cause more harm in terms of hydrology and carbon footprint than the betterment plan can accommodate for.

2. The mine site will be considerably more invasive than agricultural practices in the area. Disturbance of the blanket bog at the scale proposed poses risk to the structure of the bog which cannot be rectified if damaged.

3. Risks from blanket bog disturbance include;

Points 1 and 2:

Disturbance of the blanket bog at the overall application site has been minimised as previously discussed in the Project Alternatives (refer Chapter 5 of the ES). Unavoidably, some peat will require removal at the infrastructure site and the management thereof is addressed in the PMP (ES App B8). The PMP has been undertaken in accordance with good practice and follows the principles laid out in relevant guidance documents (i.e. SEPA guidance document WST-G-052, Version 1, issued May 2017). The key point is that the structure of the existing blanket bog on the infrastructure site is already compromised. This is detailed in the EcMMP (ES App C9) in which the existing peat areas within the infrastructure site are either largely 'degraded' or 'heavily degraded'. Transboundary

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- (i) Water contamination – excavation of peat mass can lead to the release of suspended solids and OM into watercourses...
 - (ii) Surface run-off – possible hydrological pathway for transporting peat particles and other contaminants into riverine system resulting in sedimentation and water quality degradation.
 - (iii) Peat mass instability – potential for slides and / or bog bursts depending on hydrology, slope etc.
 - (iv) Leaching – mobilization of organic compounds and mineral acids."

Response (TBR 3) concurs with this conclusion and states that the proposed development 'is dominated by peatland in Drained Artificial, Modified (Heather/Grass Dominated) Bog and extensive grassland due to historical peat cutting, hill drainage, and agricultural conversion, and that 'none of the site is in near natural condition'.

Compensation measures have been developed which include management and improvement of existing peat areas within the infrastructure site (i.e. 'Management Units') and outside of the infrastructure site (Compensation Areas), along with provision of a peat enhancement area ('Peat Enhancement Cell'). These are designed to improve the existing peatland condition and with the aim of improving peat hydrology (i.e. blocking of ditches etc.) amongst other management prescriptions as explained in the EcMMP.

Furthermore, on potential harm to hydrology of the peat, Technical Report TR 10 Groundwater states "there is no predicted drawdown impact on the peatland in the Project area" (para 9.11). TBR 3 addresses matters in relation to carbon.

Point 3(i) and 3(ii):

Where peat is completely removed (i.e. at the infrastructure site), the CEMP will manage release of suspended solids and protection of water courses during excavations. Refer to Section 3.2 of the CEMP (ES App B2) for a list of measures / principles that will be applied. Following construction, the proposed management prescriptions (refer to EcMMP, ES App C9) will have a positive impact on the potential suspended solids and organic matter that may otherwise be released from the management units into nearby water courses.

			<p><u>Point 3 (iii):</u></p> <p>Peat mass instability has been previously addressed within the PLHRA (ES App B7) which is based on industry guidance and has been approved by the statutory consultee (GSNI). Where the risk assessment has identified a Negligible or Low risk of peat instability following construction, no specific mitigation measures were considered necessary. Areas of Medium or High risk have been addressed by removing the peat entirely within those areas. Therefore, the risk of peat mass instability as a result of the scheme is considered to have been robustly dealt with.</p> <p><u>Point 3 (iv):</u></p> <p>By Improving the hydrological condition of the retained peatland (i.e. rewetting by drain blocking) the risk of mobilising organic matter and other leachates is reduced.</p>
TBA1406- Pg 2	<p>The objector states: ‘Part of our organic farm is 63 hectares of bogland in which we are trying to restore the health of the soil through regenerative agriculture methods. In contrast to our efforts, one of the Water Abstraction applications is to abstract half a million gallons of water per day for 25 years from the peatland north of Dalradian’s proposed site. Peatland is an efficient carbon store so this carbon would be lost, adding to climate change and impacting our ability to meet climate targets regionally.</p> <p>If you take this much water out of a bog it will simply cease to be a bog in a very short time, losing all those environmental benefits for us and future generations.’</p>	Yes, except in respect further detail on peat carbon.	<p>Points raised by the objector under the heading of ‘Bogland Preservation’ (TBA1406 page 2) refer to water abstraction rates and their potentially damaging impacts on peatland in relation to risk around increased flooding, and the risk of the release of stored carbon, as peatland areas dry out. TR10 Groundwater addresses abstraction during construction, operational and post-closure phases (para. 8.55 – 8.74) and the impact assessment states “there is no predicted drawdown impact on the peatland in the Project area” (para 9.11). Transboundary Response TBR 3 provides detailed information on the proposed scheme’s peat carbon balance. The Carbon Neutrality Management Plan provides an approach to achieving an overall carbon balance for the scheme.</p>
TBA1406- Pg 2	<p>The objector states: ‘Such abstraction of water would detrimentally affect the aquifers, streams, and rivers in the area, including the headwaters of the River Foyle.</p> <p>We have seen direct and devastating evidence of this during flooding in 2017, a situation which has become more common</p>	Yes	<p>Technical Report TR 10 Groundwater addresses abstraction during construction, operational and post-closure phases (para. 8.55 – 8.74) and the impact assessment states “there is no predicted drawdown impact on the peatland in the Project area” (para 9.11).</p>

since the hills above us were planted with forest plantations in the past few decades.

The roots of those trees suck up all the water from the peat soil, leading to the same effect there will be if water is taken out of a bog for mining, when heavy rain falls it flows off quickly into the streams instead of absorbing into the bog, and it rushes downstream to cause flooding in towns below.'

Transboundary Response TBR 10 Groundwater addresses in detail the matter of using surface water run-off collected from the wider peatland area.