

22.09.11

PO Box 3000

Co. Wexford

RE: THE EXTRACTION OF PEAT IN THE COURSE OF BUSINESS INVOLVES AN AREA EXCEEDING 50 HECTARES BY BULRUSH HORTICULTURE LIMITED AT CAMAGH BOG, DOON, CASTLEPOLLARD, COUNTY WESTMEATH, WESTMEATH. REG: P0599-02

Dear Sir/Madam,

This application requires an Environmental Impact Assessment under the EIA Directive.

The development of and intensification of mechanised peat extraction sites has been in systemic breach of EU Law since the application of the EIA Directive to the relevant thresholds. In addition to the mandatory thresholds now in place under Irish law under the EIA Directive sub-threshold considerations also apply where significant environmental impacts arise.

This applies to areas of ecological sensitivity or proximity to sensitive water catchments. In this case application site is in direct proximity to the River Inney salmonoid river and effects thr drainage catchment of Lough Derryvarragh Special Protection Area and Natural Heritage Area.

The siltation or carrying of suspended solids from peat extractions sites into water courses is a potentially significant environmental impact.

In addition to this the application site is in a wider peatland area in which other extraction activity is occurring of unresolved legal status. In addition other areas of peatland have been subject forestry plantation. There is a consequent need to address cumulative impact in evaluating any development on this site.

Action is further required to establish the planning status of all development affecting this site and the Environmental Protection Agency should address this matter with Westmeath County Council.

Yours sincerely, Ian Lumley, Heritage Officer