

# TOBIN

Derryhinch, Drumman, Derryarkin,  
Ballybeg and Toar Bogs – Application for  
Substitute Consent

Remedial Environmental Impact  
Assessment Report

Non-Technical Summary (NTS)

Volume I

September 2026



BUILT ON KNOWLEDGE

## Table of Contents

|          |                                                            |           |
|----------|------------------------------------------------------------|-----------|
| <b>1</b> | <b>Introduction .....</b>                                  | <b>1</b>  |
| 1.1      | Introduction .....                                         | 1         |
| 1.2      | The Applicant.....                                         | 1         |
| 1.3      | Project Description.....                                   | 2         |
| 1.4      | Site Location.....                                         | 3         |
| 1.5      | Purpose and Scope of the Remedial EIAR.....                | 5         |
| <b>2</b> | <b>REMEDIAL EIA METHODOLOGY .....</b>                      | <b>6</b>  |
| 2.1      | Environmental Impact Assessment Scoping.....               | 6         |
| 2.2      | Remedial Environmental Impact Assessment Methodology ..... | 6         |
| <b>3</b> | <b>CONSIDERATION OF REASONABLE ALTERNATIVES .....</b>      | <b>8</b>  |
| <b>4</b> | <b>PROJECT DESCRIPTION .....</b>                           | <b>10</b> |
| 4.1      | July 1988 – Remedial EIAR Baseline .....                   | 10        |
| 4.2      | Peat Extraction Phase (1988 – June 2020) .....             | 11        |
| 4.3      | Current Phase (June 2020 – Present Day).....               | 14        |
| 4.4      | Remedial Phase (Future).....                               | 14        |
| 4.5      | Future Use of the Site .....                               | 15        |
| <b>5</b> | <b>PLANNING POLICY .....</b>                               | <b>16</b> |
| 5.1      | National Policy .....                                      | 16        |
| 5.2      | Regional Policy Context.....                               | 18        |
| 5.3      | Local Policy Context.....                                  | 18        |
| 5.4      | BnM Policy Context.....                                    | 22        |
| <b>6</b> | <b>POPULATION AND HUMAN HEALTH .....</b>                   | <b>24</b> |
| 6.1      | Peat Extraction Phase (1988 – June 2020) .....             | 24        |
| 6.2      | Current Phase (June 2020 – Present Day).....               | 25        |
| 6.3      | Remedial Phase .....                                       | 25        |
| 6.4      | Residual Effects.....                                      | 26        |
| <b>7</b> | <b>BIODIVERSITY .....</b>                                  | <b>28</b> |
| 7.1      | Peat Extraction Phase (1988 – June 2020) .....             | 28        |
| 7.2      | Current Phase (June 2020 – Present Day).....               | 29        |
| 7.3      | Remedial Phase .....                                       | 29        |
| <b>8</b> | <b>LAND SOILS AND GEOLOGY .....</b>                        | <b>31</b> |



|           |                                                                     |           |
|-----------|---------------------------------------------------------------------|-----------|
| 8.1       | Peat Extraction Phase (1988 – June 2020) .....                      | 31        |
| 8.2       | Current Phase (June 2020 – Present Day) .....                       | 32        |
| 8.3       | Remedial Phase .....                                                | 33        |
| <b>9</b>  | <b>HYDROLOGY, HYDROGEOLOGY &amp; WATER QUALITY .....</b>            | <b>35</b> |
| 9.1       | Peat Extraction Phase (1988 – June 2020) .....                      | 35        |
| 9.2       | Current Phase (June 2020 – Present Day) .....                       | 37        |
| 9.3       | Remedial Phase .....                                                | 37        |
| <b>10</b> | <b>AIR QUALITY .....</b>                                            | <b>38</b> |
| 10.1      | Peat Extraction Phase (1988 – June 2020) .....                      | 38        |
| 10.2      | Current Phase (June 2020 – Present Day) .....                       | 39        |
| 10.3      | Remedial Phase .....                                                | 39        |
| <b>11</b> | <b>NOISE AND VIBRATION .....</b>                                    | <b>40</b> |
| 11.1      | Peat Extraction Phase (1988 – JUNE 2020) .....                      | 40        |
| 11.2      | Current Phase (JUNE 2020 – Present Day) .....                       | 40        |
| 11.3      | Remedial Phase .....                                                | 40        |
| <b>12</b> | <b>LANDSCAPE &amp; VISUAL .....</b>                                 | <b>42</b> |
| 12.1      | Peat Extraction Phase (1988 – June 2020) .....                      | 42        |
| 12.2      | Current Phase (June 2020 – Present Day) .....                       | 43        |
| 12.3      | Remedial Phase .....                                                | 43        |
| <b>13</b> | <b>CULTURAL HERITAGE .....</b>                                      | <b>44</b> |
| 13.1      | Peat Extraction Phase (July 1988-June 2020) .....                   | 44        |
| 13.2      | Current Phase (June 2020- Present Day) .....                        | 45        |
| 13.3      | Remedial Phase (Future) .....                                       | 45        |
| <b>14</b> | <b>MATERIAL ASSETS INCLUDING TRAFFIC &amp; TRANSPORTATION .....</b> | <b>46</b> |
| 14.1      | Peat Extraction Phase (July 1988-June 2020) .....                   | 46        |
| 14.2      | Current Phase (June 2020- Present Day) .....                        | 47        |
| 14.3      | Remedial Phase (Future) .....                                       | 47        |
| <b>15</b> | <b>CLIMATE .....</b>                                                | <b>48</b> |
| 15.1      | Peat Extraction Phase (1988 – June 2020) .....                      | 48        |
| 15.2      | Current Phase (June 2020 – Present Day) .....                       | 49        |
| 15.3      | Remedial Phase .....                                                | 49        |

|    |                   |    |
|----|-------------------|----|
| 16 | INTERACTIONS..... | 50 |
|----|-------------------|----|

## List of Tables

|                                                                        |    |
|------------------------------------------------------------------------|----|
| Table 1-1: Townlands within which the Application Site is located..... | 3  |
| Table 5-1: Summary of relevant County Development Plans .....          | 18 |

## List of Figures

|                                                              |   |
|--------------------------------------------------------------|---|
| Figure 1-1: Shows the location of the Application Site. .... | 4 |
|--------------------------------------------------------------|---|

# 1 INTRODUCTION

## 1.1 INTRODUCTION

This remedial Environmental Impact Assessment Report (remedial EIAR) Non-Technical Summary (NTS) has been prepared by TOBIN on behalf of Bord na Móna Biomass Ltd (hereafter 'the Applicant'), as part of an application for Substitute Consent for peat extraction and ancillary activities undertaken from July 1988 to the present day that have been carried out at the 'Application Site'.

The Application Site forms part of the Derrygreenagh Bog Group and comprises five bog units including (from west to east):

- Toar Bog;
- Derryarkin Bog;
- Ballybeg Bog;
- Drumman Bog; and
- Derryhinch Bog.

The Application Site comprises land predominantly under the ownership of Bord na Móna Biomass Ltd, with part of the Application Site under the ownership of Bord na Móna Energy Ltd.

The Application Site is located south of the M6 motorway within the Counties of Offaly, Westmeath and Meath, as shown in Figure 1-1.

Section 177E of the Planning and Development Act 2000, as amended, permits an application to be made for substitute consent in respect of development which has been carried out where an Environmental Impact Assessment (EIA), screening for EIA and/or Appropriate Assessment (AA) was or is required.

The application for Substitute Consent is seeking consent for development which took place from July 1988<sup>1</sup>, the timeframe for when the EIA Directive was required to be transposed into Irish Law, to present day

## 1.2 THE APPLICANT

Bord na Móna Biomass Ltd, a subsidiary of Bord na Móna plc. is an Irish, semi-state climate solutions company helping to lead Ireland towards a climate neutral future. Bord na Móna was founded in 1946, though it's precursor, the Turf Development Board, was established in 1934 with the one of the overarching aims of both entities being to enhance national energy security through peat extraction. During the 1940s, the Second World War caused coal exports from the UK to Ireland to diminish significantly. This led to the establishment of the 1944 Turf Development Board, tasked with devising and submitting a comprehensive programme for developing the nation's peat resources on an industrial scale.

This work ultimately resulted in the Turf Development Act (1946), under which Section 17(1) established Bord na Móna with the following duties:

*(a) to produce and market turf and turf products, and*

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<sup>1</sup> Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment



*(b) to foster the production and use of turf and turf products, and*  
*(c) to quire bogs and other lands, and*  
*(d) to manage, develop and work bogs and other lands vested in the Board, and*  
*(e) generally, to do all such other things as arise out of, or are consequential upon, the duties mentioned in the preceding paragraphs of this section.*

Today, Bord na Móna (now known as BnM) focus on delivering climate solutions in renewable energy, sustainable waste management, carbon storage, and biodiversity conservation. Ireland has committed to ambitious national climate targets, and BnM's actions play a key role in helping the country achieve these targets. The company's long-term vision is to support Ireland in reaching net zero greenhouse gas emissions (GHG's) by 2050. This is underpinned by Bord na Móna's 'Brown to Green' Strategy, which was formally completed in December 2023.

To power a net zero future, Bord na Móna are expanding its renewable energy infrastructure. Having constructed and maintained large-scale infrastructure for decades, the company is applying this experience to deliver renewable energy developments across the country. These projects are transforming how Ireland generates and consumes energy. With a national commitment to generating 80% of electricity from renewable sources by 2030, BnM is contributing through developments in wind, solar, biomass, and biogas to help meet this target and strengthen energy security for future generations.

BnM currently provides employment for approximately 1,500 people and manages a land holding of over 80,000 hectares located mainly in the Irish midlands. At their peak, employment numbers exceeded 7,400 in the early 1960s, with the workforce dropping to approximately 2,000 by the late 1990s.

In April 2026, Bord na Móna Powergen Ltd secured planning permission for Derrygreenagh Power, a 710MW Thermal Power Plant consisting of a Combined Cycle Gas Turbine (570MW) and Open Cycle Gas Turbine (140MW) which will fill short term gaps in renewable energy generation, ensuring a consistent electricity supply.

BnM also intends to develop a wind and solar energy project across Derryarkin, Drumman, Derryhinch and Ballybeg Bog, currently known as Derrygreenagh Wind and Solar Project.

### 1.3 PROJECT DESCRIPTION

Substitute Consent is being sought by Bord na Móna voluntarily to regularise, without prejudice, the planning status of the Application Site to facilitate appropriate future uses of these lands in compliance with the requirements of the planning system. Substitute Consent is being sought for the relevant peat extraction and ancillary activities that were undertaken at the Application Site from 1988 onwards, which consists of the following:

- Industrial scale peat extraction (milled peat);
- Use and maintenance of pre-existing surface water drainage infrastructure (drains, silt ponds, pumps) at the Application Site to facilitate peat extraction activity from 1988 to present day;
- Use and maintenance of pre-existing railway infrastructure to facilitate peat extraction from 1988 to present day;
- Provision of 2 no. vehicular bridges, 2 no. rail bridges and 2 no. gated access points;

- Control Measures associated with the above, inclusive of the IPC Licence measures (Ref. P0501-01) which commenced from 2000 onwards to the present day; and,
- All associated site development and ancillary works

These peat extraction activities are referred to as the 'Project' as appropriate. A full description of the Project is included in Section 4.5 of Chapter 4 of this remedial EIAR.

For the purposes of this remedial EIAR, the Project is defined under three different timeframes termed 'Phases':

- **Peat Extraction Phase:** peat extraction and ancillary activities at the Application Site from July 1988 to the cessation of peat extraction in June 2020 (July 1988 – June 2020). The Peat Extraction Phase is described in detail in Section 4.7 of Chapter 4.
- **Current Phase:** the management of the Application Site since June 2020 to present day. The Current Phase is described in detail in Section 4.8 of Chapter 4.
- **Remedial Phase:** the activities intended to be carried out at the Application Site into the future. The Remedial Phase is described in detail in Section 4.9 of Chapter 4.

## 1.4 SITE LOCATION

The Application Site is located south of the M6 motorway across the Counties of Offaly, Westmeath and Meath, as shown in Figure 1-1 and comprises an area of approximately 2,637 hectares (ha). The Application Site is made up of five distinct bog units which are described in more detail in Chapter 4 – Description of Development of the remedial EIAR.

The Application Site is located across the townlands listed in Table 1-1.

**Table 1-1: Townlands within which the Application Site is located**

| County    | Townlands                                                                                                                                                       |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Westmeath | Cornaher, Killavally, Pallasboy, Monrath, Rathgarrett, Rahincuill, Kiltotan and Collinstown, Farthingstown, Drumman, Milltown, Pass of Kilbride, Rattin         |
| Meath     | Derryhinch, Baltigeer                                                                                                                                           |
| Offaly    | Bunsallagh, Derryarkin, Derrygreenagh, Knockdrin, Garr, Corbetstown, Carrick, Ballybeg, Croghanhill, Barrysbrook, Togher, Toberdaly, Clonin, Coolcor, Derryiron |



**Legend**

- Application Site Boundary
- Derrygreenagh Work Location
- Towns

01.53

Kilometers

|                          |            |                                           |     |       |
|--------------------------|------------|-------------------------------------------|-----|-------|
| <b>Spatial Reference</b> |            | <b>Copyrights:</b>                        |     |       |
| Datum: IREN95            |            | Sources: Esri, TomTom, Garmin, FAO,       |     |       |
| EPSG: 2157               |            | NOAA, USGS, © OpenStreetMap               |     |       |
|                          |            | contributors, and the GIS User Community, |     |       |
|                          |            |                                           |     |       |
|                          |            |                                           |     |       |
|                          |            |                                           |     |       |
| A                        | 16/09/2026 | First issue                               | S.P | B.K   |
| Rev                      | Date       | Description                               | By  | Chkd. |

Client:

Project:

Derrygreenagh Substitute Consent

Title:

Figure 1-1:  
Site Location Map

Scale @ A3:

1:80,000

Prepared by:

Checked by:

Date:

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September 2026

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Map Ref:

12334-024-P.App.BO-OSM-TOB-A

Draft:

A

## 1.5 PURPOSE AND SCOPE OF THE REMEDIAL EIAR

The purpose of this remedial EIAR is to document the current state of the environment in the vicinity of the Application Site and to assess, in accordance with the requirements of the EIA Directive (2011/92/EU as amended by 2014/52/EU), the likely significant effects which have occurred, or which are occurring, or which can reasonably be expected to occur on the environment due to peat extraction and ancillary activities at the Application Site, from July 1988 to present day.

It is important to distinguish the remedial Environmental Impact Assessment (EIA) to be carried out by ACP, from the remedial EIAR which is accompanying the Substitute Consent application. The remedial EIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the EIA Directive (2011/92/EU as amended by 2014/52/EU), the direct and indirect effects of the development on the following:

- a) Population and human health
- b) Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC
- c) Land, soil, water, air, and climate
- d) Material assets, cultural heritage and the landscape
- e) The interaction between the factors referred to in points (a) to (d)

This remedial EIAR submitted by Bord na Móna Biomass Ltd provides the relevant environmental information to enable the remedial EIA to be carried out by the competent authority. The information to be contained in the remedial EIAR is prescribed in Article 5 and Annex IV of the EIA Directive and Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (as amended). Further detail on the content, methodology, and scope of the remedial EIAR is provided in Chapter 2 - Remedial EIA Methodology and a summary is provided below.

## 2 REMEDIAL EIA METHODOLOGY

This chapter presents details on the requirements of the remedial EIA for the Project as well as the temporal scope applied to the remedial EIA process. An overview of the methodology used for the identification and evaluation of likely significant effects on the environment is also presented as well as the approach to identifying mitigation, monitoring and control measures. The approach to residual effects, cumulative effects, transboundary effects and the do-nothing scenario are also described.

### 2.1 ENVIRONMENTAL IMPACT ASSESSMENT SCOPING

EIA Scoping for the Project at the Application Site was carried out in accordance with the relevant EIA guidance documents. A scoping letter, providing details of the Application Site and the Project, was prepared by TOBIN and was circulated in February 2023. TOBIN requested the comments of the relevant bodies in their respective capacities as consultees with regards to the remedial EIA process. A further round of scoping was conducted in June 2026. The recommendations of the consultees have informed the remedial EIAR preparation process and the contents of the same.

### 2.2 REMEDIAL ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

Section 177F (1) of the Planning and Development Acts 2000 (as amended) state that a remedial EIAR shall contain the following:

- “(a) a statement of the significant effects, if any, on the environment, which have occurred or which are occurring or which can reasonably be expected to occur because the development the subject of the application for substitute consent was carried out;*
- (b) details of— (i) any appropriate remedial measures undertaken or proposed to be undertaken by the applicant for substitute consent to remedy any significant adverse effects on the environment; (ii) the period of time within which any proposed remedial measures shall be carried out by or on behalf of the applicant.”*

In March 2026, ACP published guidelines on ‘Information to be submitted with Substitute Consent and Section 37L Applications under the Planning and Development Act 2000 and the Planning and Development Regulations 2001 (as amended)’<sup>2</sup>. The guidance document is intended to assist applicant in the preparation of documents and includes a checklist for validation.

The Environmental Protection Agency (EPA) Guidelines (Guidelines on the information to be contained in Environmental Impact Assessment Reports, May 2022) have been used to undertake this remedial EIAR. As per the EPA Guidelines, the main purpose of an EIAR is ‘to identify, describe and present an assessment of the likely significant effects of a project on the environment’. The description of the likely significant effects on the environmental factors will

<sup>2</sup> [https://www.pleanala.ie/getattachment/57076a32-6bd2-4c34-9efd-c4adf1135d54/Guidelines-on-Information-to-be-submitted-with-Substitute-Consent-and-Section-37L-applications-\(1\).pdf?lang=en-IE](https://www.pleanala.ie/getattachment/57076a32-6bd2-4c34-9efd-c4adf1135d54/Guidelines-on-Information-to-be-submitted-with-Substitute-Consent-and-Section-37L-applications-(1).pdf?lang=en-IE) (Accessed on 9 September 2026)



cover the direct, indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the Project.

### 3 CONSIDERATION OF REASONABLE ALTERNATIVES

This chapter in the remedial EIAR sets out the need for the Project and provides the background of the development programmes which led to the peat extraction and ancillary activities at the Application Site including Derryhinch, Drumman, Derryarkin, Ballybeg and Toar Bogs. This chapter also explores the alternatives considered and an indication of the main reason for the final choice, taking into account the environmental effects.

Taking the legislative and guidance requirements into account, this chapter examines the alternatives under the following headings:

- 'Do Nothing' Option;
- Alternative Locations;
- Alternative Industries;
- Alternative Layout;
- Alternative Processes;
- Alternative Control Measures; and,
- Alternative to the Rehabilitation Plan.

As outlined in the EPA Guidelines (May 2022), the description of 'Do-Nothing Effects' relates to the environment as it would be in the future should the Project not be carried out. The assessment period of this remedial EIAR commenced in 1988, a time at which peat extraction was already well-established at the Application Site with peat extraction activities having commenced in 1950 with the installation of drainage.

The 'Do-Nothing' option is defined as the Project having ceased at the Application Site in 1988.

In the event of the cessation of the Project at the Application Site in 1988, it is assumed that those lands which by that point had not been subject to the installation of drainage and peat extraction would have remained as a relatively intact raised bog with varying raised bog habitats (such as bog woodland, fen, sphagnum mosses). Subsequently, other land-use practices may also have taken place on the Application Site such as agricultural or commercial forestry, or other commercial or non-commercial uses.

The location, nature, landcover and scale of the Application Site determined its selection by Bord na Móna, under powers vested by the Turf Development Act, 1946, as a strategic and important national asset to generate considerable fuel sources for the State. Alternative industries or uses were not possible at the Application Site in 1988, and alternative locations could only be other large scale peat sites which were acquired by the State and underwent largescale peat extraction. Thus, alternative locations or industries are not considered a reasonable alternative. Similarly, as peat extraction was already ongoing in 1988 and continued until June 2020, a 'Do-Nothing' option is not credible as the Project has already occurred. Building on the success of operations from the 1950's to 1988, the further expansion of peat extraction and ancillary activities was undertaken from 1988 at the Application Site in the form of expanding the footprint of the areas subject to active peat extraction.

With the implementation of Bord na Móna's 2018 'Brown-to-Green' Strategy<sup>3</sup> and the permanent cessation of peat extraction at the Application Site in June 2020, Bord na Móna recognises the opportunity to transform the site into a sustainable, clean, and renewable energy asset while simultaneously facilitating peatland rehabilitation at the site and providing opportunities for amenity, tourism and employment.

Accordingly, the preferred future use for the Application site includes the potential development of Derrygreenagh Wind and Solar Project, that would optimise the site's renewable energy potential while avoiding significant environmental effects. This future use is compatible with, and can be delivered in parallel with, the statutory peatland rehabilitation obligations set out under Condition 10 of the site's IPC Licence.

A third party intends to develop infrastructure at lands within the Application Site, consistent with the Government's Large Energy User Action Plan (LEAP), and which will be subject to separate planning and regulatory consent as appropriate.

Any future development will be the subject of a separate planning application and environmental assessment, as required.

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<sup>3</sup> 2018 Brown to Green Strategy referenced in Bord na Móna Annual Reports [Bord na Móna reports progress on Brown to Green Strategy and costs of decarbonisation programme - BnM](#) [Accessed 18 June 2026]



## 4 PROJECT DESCRIPTION

This chapter of the remedial EIAR provides a description of the activities at the Application Site from 1950, where the timing of the installation of drainage and initiation of peat extraction activities varied. A description of the baseline as of July 1988 is presented as well as a description of activities from 1988 until the cessation of peat extraction in June 2020. The management of the Application Site since June 2020 is described as well as the activities intended to be carried out at the Application Site into the future.

As described above and in Chapter 1 of the remedial EIAR, July 1988 is taken as the baseline assessment year for the remedial EIAR as this is the latest date that European Union Council Directive 85/337/EEC was required to be transposed into Irish legislation. This approach has been taken on a precautionary basis and strictly without prejudice, as EIA may not have been a legal requirement at that time. The assessment period for the remedial EIAR is from the July 1988 to the present day, and the future Remedial Phase.

The peat extraction and ancillary activities undertaken at the Application Site, which comprise the Project for which Substitute Consent is being sought and for which this remedial EIAR is prepared, consist of activities as highlighted in section 1.3 of this Non-Technical Summary.

### 4.1 JULY 1988 – REMEDIAL EIAR BASELINE

By 1988, land use at the Application Site was well-established as industrial milled peat extraction, there was extensive drainage infrastructure installed on the site, with the Application Site drained close to its maximum extent. There was limited drainage inserted on a further c. 20.8ha (i.e. 0.79% of the Application Site area) between 1988 and 2004, with the area subject to drainage remaining the same until the cessation of peat extraction in 2020. Although drainage infrastructure had been installed across substantial areas of the Application Site by 1988, some areas remained neither drained nor subject to peat extraction. The following ancillary infrastructure was established at the site by July 1988:

- Railway infrastructure (all bogs within the Application Site);
- Rail and vehicular bridges (Derryhinch and Drumman Bog);
- Gates site access (Drumman and Derryarkin);
- Silt ponds and drains (all bogs within the Application Site); and
- Pumping stations (at Ballybeg Bog).

Drain deepening and maintenance would have continued at the Application Site in 1988. As stated in Section 4.5.3 of Chapter 4 of the remedial EIAR, drainage channels were in place prior to 1988 as well as several silt ponds, outfalls, and two pumps in Ballybeg.

The total tonnage of peat extracted at the Application Site between July 1988 and December 1988 was 468,137.5 tonnes. The estimated topography of the Application Site in as of July 1988 is based on an average depth of milled peat extraction of 0.1 m per year over a 31-year period, which has been worked back from the 2020 topography (refer to Table 8.4 Section 8.3.2 of Chapter 8).

## 4.2 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

During the Peat Extraction Phase, the deepening and maintenance of drainage channels continued beyond 1988 and remained ongoing at each bog until peat extraction ceased. As the areas subject to peat extraction gradually decreased in extent over time, and as the available peat depth correspondingly reduced, the number and extent of drains requiring deepening and maintenance also reduced over time.

The volumes of peat extracted at the Application Site varied from year to year and were influenced by weather conditions. Between July 1988 and June 2020, an average of 173,799 tonnes of peat were extracted each year, with a total of 5,735,371 tonnes extracted at the Application Site between July 1988 and the cessation of peat extraction in June 2020.

Chapter 4 of the remedial EIAR provides a detailed description of the drainage design, silt ponds and peat extraction volumes from July 1988 to 2020.

### 4.2.1 Ancillary Activities

There are several ancillary structures and features associated with peat extraction and ancillary activities at the Application Site. These include:

- Workshops;
- Works offices;
- Welfare Facilities;
- Vehicular and rail bridges;
- Local holding areas; and
- Railway infrastructure.

With the exception of most railway infrastructure, vehicular and rail bridges, and local holding areas, the remaining ancillary infrastructure is located outside of the Application Site boundary and as such substitute consent is not being sought in respect of this ancillary infrastructure. Nonetheless, to provide as detailed a description as possible of the Project, the ancillary infrastructure is described in chapter 4 of the remedial EIAR.

### 4.2.2 Pilot Rehabilitation Trails

Pilot rehabilitation activities at Derryarkin commenced between 2001 and 2002, with areas of cutaway peatland rewetted through drain blocking and modifications to the main outfalls. Further rehabilitation trials were undertaken at Derryarkin in 2016, involving the application of fertiliser to approximately 30 ha of cutaway peatland in the northeastern portion of the site to promote vegetation establishment. At Drumman, rehabilitation trials were undertaken between 2010 and 2014 across approximately 18 ha of bare peat, with stabilisation and re-vegetation achieved through the application of fertilisers and nurse crops.

These trials were undertaken to inform the suitability of rehabilitation measures for their inclusion in the Draft Cutaway Bog Decommissioning and Rehabilitation Plans which are required to be drafted in accordance with Condition 10 of the IPC Licence. No new rehabilitation trials have taken place, nor are planned to take place, during the Current Phase.

Rehabilitation measures will be undertaken in accordance with the detail set out in the Draft Cutaway Bog Decommissioning and Rehabilitation Plans (see Appendix 4-2), subject to

agreement with the EPA. Details of these measures have also been included in Table 4.7, Section 4.9 below.

### 4.2.3 Control Measures from 1988 to 2000

Following 1988 and before the introduction of the IPC Licence in 2000, Bord na Móna continued to apply environmental management measures across the site. Measures to control water quality, including silt ponds designed to reduce sediment in surface water runoff, were already in place and were further improved through studies and monitoring programmes undertaken during the 1980s and 1990s.

Bord na Móna has also had a long-standing commitment to protecting archaeological heritage within its peatlands. Following the discovery of important archaeological remains, including trackways at Corlea Bog in the 1980s, extensive archaeological survey programmes were introduced across Bord na Móna bogs. Since 1991, annual archaeological surveys have been carried out, with findings recorded and shared with the relevant national heritage authorities.

Since 1998, Bord na Móna has had a legal obligation to protect both the environment and archaeological heritage under the Turf Development Act 1998. To support this responsibility, procedures were established for identifying, recording and protecting archaeological features and objects uncovered during peat extraction activities. Dedicated archaeological staff and liaison officers were appointed, and archaeological surveys, excavations and environmental studies have been funded by Bord na Móna.

In 2012, a formal Code of Practice was introduced between Bord na Móna and the national heritage authorities. This framework ensures that peat extraction activities are carried out alongside appropriate archaeological protection measures. These measures include ongoing archaeological monitoring, reporting of new discoveries, protection of archaeological remains, engagement of specialist archaeologists, and funding of excavation, conservation, scientific analysis and reporting where required. By 2013, archaeological surveys had been completed across approximately 64,000 hectares of Bord na Móna lands.

### 4.2.4 Control Measures 2000 to Present Day (Post-IPC Licence)

Bord na Móna was granted an IPC Licence (Reg. No. P0501-01) for the Derrygreenagh Bog Group (within which the Application Site is located) in April 2000.

Following the grant of the IPC Licence in 2000, Bord na Móna staff underwent an EPA IPC Licence Compliance training programme, which resulted in the development of an environmental management system. This system addresses emissions to water and air, noise, vibration and odour emissions, waste management, use of natural resources, visual effects and the natural environment and ecosystem.

The conditions of the IPC Licence are intended for the protection of the environment and apply from the time of grant of the IPC Licence. The EPA has undertaken Technical Amendments of the IPC Licence for the purpose of aligning the conditions of the IPC Licence to the objectives of national and European environmental protection legislation enacted over the lifetime of the IPC Licence.

The IPC Licence is subject to 14. no conditions pertaining to the ongoing monitoring and maintenance to ensure any emissions from site activities will comply with and not contravene, any of the requirements of Section 83(3) of the Environmental Protection Agency Act, 1992 outlined below:

*(3) The Agency shall not grant a licence or revised licence for an activity unless it is satisfied that—*

- a) any emissions from the activity will not result in the contravention of any relevant air quality standard specified under section 50 of the Air Pollution Act, 1987, and will comply with any relevant emission limit value specified under section 51 of the Air Pollution Act, 1987,*
- b) any emissions from the activity will comply with, or will not result in the contravention of, any relevant quality standard for waters, trade effluents and sewage effluents and standards in relation to treatment of such effluents prescribed under section 26 of the Local Government (Water Pollution) Act, 1977,*
- c) any emissions from the activity or any premises, plant, methods, processes, operating procedures or other factors which affect such emissions will comply with, or will not result in the contravention of, any relevant standard including any standard for an environmental medium prescribed under regulations made under the European Communities Act, 1972, or under any other enactment,*
- d) any noise from the activity will comply with, or will not result in the contravention of, any regulations under section 106,*
- e) any emissions from the activity will not cause significant environmental pollution, and*
- f) the best available technology not entailing excessive costs will be used to prevent or eliminate or, where that is not practicable, to limit, abate or reduce an emission from the activity,*

*and, where appropriate, the Agency shall attach conditions relating to the matters specified in the foregoing paragraphs to the licence or revised licence.*

Conditions 1 to 4 of the IPC Licence outline the Scope, Management, Interpretation and Notification procedures required by the Applicant, respectively. Conditions 11 to 14 detail the Monitoring (equipment use), Recording and Reporting, Emergency Response and Financial Provisions duties of the Applicant. Conditions 5 to 10 pertain to environmental monitoring and management:

- Condition 5 Emissions to Atmosphere
- Condition 6 Emissions to Water
- Condition 7 Waste Management
- Condition 8 Noise
- Condition 9 Water Protection
- Condition 10 Cutaway Bog Rehabilitation

It is the intention of the of Bord na Móna to continue implementing and practising the monitoring measures as listed in the Licence after the site is decommissioned, where applicable.

### 4.3 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

In January 2021, Bord na Móna formally announced that peat extraction across all bogs within its landholding had ceased, although peat extraction at the Application Site had ceased prior to this in June 2020.

The Application Site still operates under the requirements of IPC Licence, and any decommissioning works undertaken with respect to peat extraction and ancillary activities are in accordance with Condition 10 of the IPC Licence.

In compliance with Condition 10.1 of the IPC Licence, it is a requirement of the licensee to decommission the Application Site by removing/disposing/recovering buildings, equipment, waste materials and other ancillary infrastructure from the Application Site.

A key objective of Condition 10 is to ensure that the Application Site is not causing, and is not likely to cause, environmental pollution, and that the site is left in a satisfactory condition such that the licensed lands can be deemed suitable for surrender of the IPC License under Section 95 of the EPA Acts.

The onsite machinery which are used during the Current Phase include;

- Wheeled Loader Lorry;
- Track Excavator;
- Locomotive and Wagons;
- Dump Truck, and;
- Tractors.

In reality, the majority of this machinery will be stored on site and will access the Application Site via the bogs themselves, thus ensuring there will be minimal vehicle movements associated with the machine works during the Current Phase.

Following the cessation of peat extraction, any remaining stockpiled peat at the Application Site was systematically transported off site in accordance with the IPC Licence. Stockpile removal was completed in 2021.

A full description of the decommissioning works, including future decommissioning works, is provided in Chapter 4, Section 4.8 of the remedial EIAR.

### 4.4 REMEDIAL PHASE (FUTURE)

Following the conclusion of the decommissioning activities, Bord na Móna is required under Condition 10.2 of the IPC Licence to prepare (to the satisfaction of the EPA) and implement, a Cutaway Bog Rehabilitation Plan.

Bord na Móna has produced draft Cutaway Bog Decommissioning and Rehabilitation Plan (2026) for each of the five bogs within the Application Site including Derryhinch, Drumman, Derryarkin, Ballybeg and Toar Bogs. Table 4-7 in Chapter 4 of the remedial EIAR includes a detailed description of the completed phased trial rehabilitation measures and proposed rehabilitation measures.

It is the intention of Bord na Móna to complete the rehabilitation of the bogs in a phased approach under the requirements of the IPC Licence.

## 4.5 FUTURE USE OF THE SITE

In line with the BnM's vision to assist in achieving a climate neutral Ireland by 2050, it is intended to utilise the Application Site for both peatland remediation and energy infrastructure and to facilitate environmental stabilisation of the Application Site and the optimisation of climate action benefits.

In April 2026, Bord na Móna Powergen Ltd secured planning permission for a thermal power plant known as Derrygreenagh Power, located within Drumman and Ballybeg Bog. The facility is expected to be fuelled by natural gas and will provide a reliable source of electricity during periods of reduced generation from renewable energy sources.

BnM also intends to develop the Derrygreenagh Wind and Solar Project across Derryarkin, Drumman, Derryhinch and Ballybeg Bog. The project is currently at the design stage and is expected to include wind turbines, solar photovoltaic panels and a battery energy storage system. The design will align with and integrate the peatland rehabilitation measures required under IPC Licence P0501-01.

A third party intends to develop infrastructure at lands within the Application Site, consistent with the Government's Large Energy User Action Plan (LEAP), and which will be subject to separate planning and regulatory consent as appropriate.

Any future development within the Application Site will be subject to separate planning applications and, where required, an Environmental Impact Assessment Report (EIAR) assessing the likely significant environmental effects of construction, operation and decommissioning, including consideration of the peatland rehabilitation measures.

## 5 PLANNING POLICY

This chapter of the remedial EIAR provides a summary of the strategic planning policy context for regularising peat extraction works within the Application Site. It considers national, regional, and local planning policies, including the Climate Action Plan 2025 (CAP25). The chapter also outlines the historical background of peat extraction, highlighting policies that initiated and facilitated its development.

Peatlands have been a significant cultural and economic resource in Ireland for over a thousand years, with turf being a major fuel source by the 17th century. The Turf Development Board Ltd, later known as Bord na Móna, was established to manage national peat resources. The use of peat as an indigenous fuel resource gained prominence during World War II due to depleted coal reserves in the United Kingdom. Government projects and development programmes were implemented to acquire boglands, develop fuel sources, and create power generation stations for increased energy security and employment.

A full review of the relevant national, regional and local planning policies is provided chapter 5 of the remedial EIAR and Planning Report (Appendix 4.2).

### 5.1 NATIONAL POLICY

This section provides a summary of the current national planning policies and climate policies relevant to the planning application today. A summary of the relevant historic national policies and climate plans during the Peat Extraction Phase is provided in chapter 5 of the remedial EIAR and Planning Report.

#### 5.1.1 National Planning Framework

The National Planning Framework (NPF) – First Revision (“NPF”) was approved by Government and the Oireachtas in April 2025. The NPF constitutes the State’s high-level strategic planning and development framework and guides national, regional and local planning policy to 2040. It is the Government’s high-level strategic plan to shape Ireland’s development until the year 2040. It establishes a set of National Strategic Objectives (NSOs), National Policy Objectives (NPOs) and strategic planning principles to inform planning decisions.

The revised NPF places a strong emphasis on supporting Ireland's transition to a low-carbon and climate-neutral economy. It promotes the expansion of renewable energy generation, strengthening of electricity infrastructure and deployment of technologies such as wind energy, solar energy, energy storage and smart grids.

The NPF also recognises the important role of peatlands in climate change mitigation because of their ability to store carbon. At the same time, it acknowledges that certain cutaway and previously developed peatland areas may have a role in supporting renewable energy projects and broader sustainable development initiatives. The framework supports a balanced approach that seeks to protect and restore peatland habitats while facilitating appropriate renewable energy development and economic diversification where suitable.

In support of a "Just Transition", the NPF promotes the sustainable reuse of former peat extraction lands, helping to support local communities and regional economies as Ireland moves

away from traditional peat-based industries. This includes opportunities for renewable energy development, environmental rehabilitation and recreation-related projects such as greenways, blueways and peatways.

Overall, the objectives of the NPF support the long-term rehabilitation and sustainable management of former peat extraction areas. The framework recognises the need to balance climate action, peatland restoration, renewable energy development and rural economic transition, which are all relevant considerations in the assessment of the Application Site.

### 5.1.2 National Development Plan 2021-2027

The National Development Plan (NDP) 2021–2027 is aligned with the delivery of the objectives of the NPF.

The NDP includes National Strategic Outcome 8 – Transition to Climate-Neutral and Climate Resilient Society, recognising that the national objective of achieving, by 2050, a competitive low carbon, climate resilient and environmentally sustainable economy must directly influence public capital investment decisions. The Plan acknowledges that Ireland's energy system requires a fundamental transformation in order to meet national energy and climate objectives. This includes a major shift in how energy is generated, transmitted and consumed, supported by substantial investment in renewable energy sources, ongoing capacity renewal and emerging technologies.

Renewable energy, particularly wind energy, is identified within the NDP as a key component of Ireland's transition away from reliance on fossil fuels and towards a decarbonised energy system. This transition also provides opportunities for economic regeneration and employment, particularly in regions historically associated with peat extraction and energy extraction.

In this context, the cessation of peat extraction, the decommissioning of extraction infrastructure at the Application Site, and the future rehabilitation and restoration of cutover bogs, together with the regularisation of historic peat extraction, will contribute positively to the achievement of the NDP's climate, environmental and regional development objectives. Further detail on the rehabilitation measures is set out in the draft Rehabilitation Plans included in Appendix 4-3.

### 5.1.3 Climate Action and Low Carbon Development (2021-2025)

The Climate Action Plan 2021 was the first Climate Action Plan prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021 and established the statutory framework for climate governance, sectoral emissions ceilings and annual climate action planning. The Plan set out initial actions and pathways for decarbonisation across all sectors of the economy.

Climate Action Plans are updated annually to reflect progress and emerging priorities. The Climate Action Plan 2025 (CAP25), published in April 2025, builds on previous plans by refining and updating the measures needed to achieve Ireland's climate objectives. CAP25 emphasises the need for accelerated action to reduce greenhouse gas emissions and meet national and international climate commitments.

The Climate Action Plans support the development of renewable energy infrastructure, improvements in energy efficiency, and measures that contribute to the reduction of carbon emissions. These objectives are relevant to the future management and use of former peat extraction areas, including opportunities for renewable energy development and land rehabilitation, while contributing to Ireland's wider climate action goals.

Overall, Ireland's climate policy framework supports actions that facilitate the transition to a low-carbon economy and promote sustainable land use, which are relevant considerations in the assessment of the Application Site.

## 5.2 REGIONAL POLICY CONTEXT

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region came into effect on 28 June 2019. It provides a regional development framework that supports the implementation of the NPF and Government policy.

Of particular relevance to this application, the RSES recognises the strategic importance of peatlands within the Region and identifies a number of guiding principles that should inform future development and land management within peatland areas. These include:

- Consideration of the potential contribution of peatlands to climate change mitigation and adaptation, including renewable energy production;
- Consideration of habitats and species of environmental significance;
- Consideration of the potential contribution of peatlands to an existing or proposed greenway, blueway and peatway network;
- Consideration of the ecosystem services and tourism potential provided by peatlands; and
- Development of peatlands shall ensure that there are no negative impacts on water quality.

A full review of the RSES is provided in Chapter 5 of the remedial EIAR and Planning Report (Appendix 4.2).

## 5.3 LOCAL POLICY CONTEXT

The Application Site is located within the counties of Offaly, Meath and Westmeath therefore all three of the counties 'County Development Plans (CDPs)' have been assessed within this local policy section. Given the peat extraction commenced in the 1950's, and the earliest County Development Plan is in 1967, a review of all CDPs has been provided and summarised in the subsequent sections starting with the most recent CDPs.

Table 5-1 provides a summary of the CDPs relevant to the Project.

**Table 5-1: Summary of relevant County Development Plans**

| County | Relevant Development Plans                                                                                                                                      |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Offaly | Offaly County Development Plan 1967, Offaly County Development Plan 1987, Offaly County Development Plan 1995, Offaly County Development Plan 2003–2009, Offaly |

|           |                                                                                                                                                                                                                                                                    |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | County Development Plan 2009–2015, Offaly County Development Plan 2014–2020, Offaly County Development Plan 2021–2027.                                                                                                                                             |
| Westmeath | Westmeath County Development Plan 1986, Westmeath County Development Plan 1994, Westmeath County Development Plan 2002–2008, Westmeath County Development Plan 2008–2014, Westmeath County Development Plan 2014–2020, Westmeath County Development Plan 2021–2027 |
| Meath     | Meath County Development Plan 1994, Meath County Development Plan 2000 (Draft), Meath County Development Plan 2007–2013, Meath County Development Plan 2013–2019, Meath County Development Plan 2021–2027                                                          |

As peat extraction has until recent years been exempt from the requirement to obtain planning permission, historical local policy does not refer to the activity of extracting peat in itself but instead recognises the broader community wide benefits of peat extraction such as employment, rural development and electricity development.

### Offaly County Development (2021-2027)

The current Offaly County Development Plan 2021-2027 sets out the strategy for the sustainable development of County Offaly. The Plan is aligned with national and regional planning policy and aims to support economic development, environmental protection, community wellbeing and climate resilience.

A key objective of the Plan is to support the transition to a low-carbon and climate-resilient future. The Plan recognises the importance of reducing greenhouse gas emissions, protecting biodiversity and promoting the sustainable use of natural resources.

The County Development Plan acknowledges the significant role that peat extraction has played in the economy of Offaly and the wider Midlands region. It also recognises the challenges associated with the move away from peat-based energy production and supports a Just Transition for communities affected by this change. This includes support for peatland rehabilitation and restoration, together with new economic opportunities that can contribute to sustainable regional development.

The Plan identifies Offaly's extensive peatland resource as having potential to support renewable energy development, energy storage projects and other emerging low-carbon technologies. Former industrial peatlands and cutaway bogs are recognised as locations that may accommodate appropriate forms of renewable energy and related infrastructure, subject to environmental protection and assessment requirements.

The County Development Plan supports the development of long-term strategies for the sustainable after-use of industrial peatlands, including peatland rehabilitation, biodiversity enhancement, renewable energy development and green economy initiatives. The Plan also promotes the implementation of national peatland, biodiversity and climate action policies and seeks to ensure that future development is compatible with peatland restoration objectives.

Overall, the Offaly County Development Plan supports the transition of former peat extraction areas towards sustainable future uses, while balancing climate action, biodiversity protection, peatland rehabilitation and economic development objectives. These policy objectives are relevant to the continued management, rehabilitation and future use of the Application Site and are consistent with wider national and regional Just Transition and climate action policies.

### Historic Offaly County Developments

The Offaly County Development Plans from 1967 to 2020 recognise the importance of peatlands in County Offaly, including their significance for employment, energy production, natural and archaeological resources, and the local economy. The Plans recognise the finite nature of peat resources and the need for planning for the future use and after-use of cutaway bogs, including alternative uses such as renewable energy, employment, habitat restoration, conservation, tourism, amenity, education and research. A planning policy review from 1967 to the current County Development Plan (2021-2027) is provided in chapter 5 of the remedial EIAR and accompanying Planning Report (Appendix 4.2).

### Westmeath County Development (2021-2027)

The current Westmeath County Development Plan (2021- 2027) provides the framework for planning and development within County Westmeath. The Plan promotes sustainable development through a number of strategic objectives, particularly those relating to climate action, protection of the natural environment, green infrastructure and rural development.

The Plan recognises peatlands as an important feature of the county's landscape and environment. Peatlands support biodiversity, store carbon, help regulate water resources and contribute to climate change mitigation. The Plan acknowledges that the rehabilitation and restoration of peatlands has potential to play an important role in meeting climate action objectives while also providing environmental, social and economic benefits.

The County Development Plan supports cooperation between public authorities, Bord na Móna and other stakeholders in the sustainable management, rehabilitation and future use of peatland areas. It also promotes the protection and restoration of biodiversity and encourages the implementation of national policies relating to nature conservation, peatland management and climate action.

The Plan identifies the transition to a low-carbon and green economy as a key objective for County Westmeath. It supports the development of renewable energy, carbon reduction initiatives and other sustainable economic activities that contribute to climate action goals. The Plan also encourages rural economic diversification, including opportunities associated with renewable energy, tourism, recreation and other sustainable enterprises.

Cutaway and previously developed peatlands are recognised as having potential to accommodate renewable energy projects and other appropriate forms of development, subject to environmental protection measures and consideration of landscape, biodiversity and ecological sensitivities.

Overall, the Westmeath County Development Plan supports the sustainable management, rehabilitation and future transition of peatland areas while balancing climate action, biodiversity protection and rural economic development. These objectives are relevant to the continued management and rehabilitation of the Application Site and are consistent with national and regional policies supporting climate action and Just Transition objectives.

### Historic Westmeath County Development Plans

The Westmeath County Development Plans from 1986 to 2020 reflect the changing policy context for peatlands, from their role in energy production and employment to their future use, environmental protection and renewable energy potential.

The 2014–2020 Plan supports renewable energy and forward planning for the sustainable after-use of industrial peatlands and cutaway bogs. The finite nature of peat resources and potential future are identified in the 2008–2014 Plan for cutaway areas, including habitat creation, recreation, agriculture, forestry and wind energy.

Between 2002–2008, Westmeath CDPs acknowledged the economic and employment importance of peat extraction alongside the ecological, archaeological and heritage value of boglands. The 1994 Plan identifies boglands as a resource for power generation and peat extraction, while also recognising their amenity value and the importance of protecting bogs of international importance. The 1986 Plan recognises their contribution to power generation, peat extraction and employment, while also seeking to preserve ecological balance and areas of scientific interest.

A detailed assessment of the relevant planning policies within the current Westmeath County Development Plan (2021–2027) is provided in Chapter 5 of the remedial EIAR and the Planning Report (Appendix 4.2).

### Meath County Development Plans (2021–2027)

The Meath County Development Plan 2021 – 2027 (MCDP) provides the framework for guiding development within the county and places a strong emphasis on climate action, environmental protection and sustainable economic development.

The Plan supports national climate action objectives, including reducing greenhouse gas emissions, increasing the use of renewable energy and helping communities adapt to the effects of climate change. It also recognises the important role of peatlands in supporting climate regulation, biodiversity and wider ecosystem services.

Peatlands are identified as part of the county's Green Infrastructure network, which includes habitats such as wetlands, rivers, woodlands and other natural areas that provide environmental and social benefits. The Plan supports the conservation, management and restoration of peatlands, while recognising that some cutaway and cutover peatlands may be suitable for complementary uses such as renewable energy projects, habitat enhancement and recreational amenities, subject to environmental protections.

The Plan also promotes the development of a Green Economy and supports sustainable rural enterprise, including renewable energy, forestry, agriculture and other activities that contribute to the transition to a low-carbon economy. The development of renewable energy infrastructure is supported where potential impacts on the environment, landscape, biodiversity and local amenity can be appropriately managed.

Within this policy context, the Application Site represents part of Meath's wider peatland resource, where future land management and use will be guided by objectives relating to climate action, environmental protection, biodiversity enhancement and sustainable economic development.

### Historic Meath County Development Plans

The Meath County Development Plans 2001, 2007 to 2013 and 2013 to 2019 provide policy context for the Application Site, including its historical use, landscape setting, peatlands and renewable energy.

The 2013 to 2019 CDP recognised the potential of renewable energy technologies to reduce greenhouse gas emissions and identified onshore wind energy as a renewable energy option for County Meath. In relation to peatlands, NH POL 11 sought to ensure the conservation of designated or proposed designated peatlands for their ecological, archaeological, cultural and educational significance, while NH OBJ 4 supported partnership working on peatland conservation, management and restoration.

The 2007 to 2013 CDP placed emphasis on natural, archaeological and landscape heritage and included HER POL 18, relating to the conservation and appropriate management of designated peatlands, and HER POL 55, relating to the protection of peatlands and archaeological features. The Plan also included HER POL 88, supporting the sustainable development of rural communities where environmental, landscape and heritage resources were not compromised.

The Meath County Development Plan 2001 recognised peat extraction as an established use within the rural landscape of the County and addressed the potential effects of development activities on landscape character, visual amenity and environmental quality. It also identified different areas according to their visual characteristics and sensitivity to development. The Application Site is identified in the Area of Visual Quality Map as VQ 11, rural and agricultural land.

A detailed assessment of the relevant planning policies within the current Westmeath County Development Plan (2021-2027) is provided in Chapter 5 of the remedial EIAR and the Planning Report (Appendix 4.2).

## 5.4 BNM POLICY CONTEXT

Since its initial inception in 1934 as the Turf Development Board Ltd., Bord na Móna has risen to the needs of the country at any given point in time, be that the management of peatlands under its ownership to provide a much-needed indigenous fuel resource, or to contribute to the development of a low carbon energy system.

Today, BnM has radically changed its approach to face an even greater challenge; climate change. BnM has ended peat extraction and now focuses on developing climate solutions in renewable energy, sustainable waste management, carbon storage, and biodiversity conservation.

Ireland has committed to ambitious climate goals and BnM's climate solutions are helping to achieve them. BnM's vision is to help Ireland reach net zero greenhouse gas emissions by 2050 through the implementation of the Brown to Green Strategy 2018, Sustainability 2030 Strategy<sup>4</sup> and Biodiversity Action Plan 2016 -2021<sup>5</sup>. The Brown to Green, Sustainability

<sup>4</sup><https://www.bordnamona.ie/wp-content/uploads/2021/03/Bord-na-Mona-Sustainability-Statement-2015.pdf> [Accessed on 18 June 2026]

<sup>5</sup><https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf> [Accessed on 18 June 2026]



Strategy and Biodiversity Action Plan is detailed within Chapter 5 of the remedial EIAR and accompanying Planning Report.

## 6 POPULATION AND HUMAN HEALTH

Chapter 6 of the remedial EIAR examines the receiving environment and investigates the likely significant effects on population and human health resulting from Bord na Móna's peat extraction and ancillary activities, at the Application Site during the Peat Extraction, Current Phase and Remedial Phase. A summary of chapter 6 of the rEIAR is provided below.

For the purposes of this assessment, the activities associated with the Project have been assessed during the Peat Extraction Phase, Current Phase and Remedial Phase. Impacts have been assessed against available historical and recent datasets. A baseline condition of the population, socio-economic and local community health in 1988 was established during a desktop study which reviewed national guidance documents, publicly available statistics, surveys, datasets, and resources to assess the past and likely significant effects of the Project and to provide control measures where required.

### 6.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

In terms of population, the effects of the industrial peat extraction work on population receptors, such as land use, demographics, employment and economy, property, community facilities and tourism and recreation, were reviewed and assessed, and have been summarised below:

- Land use: The change in land use from the baseline year of 1988 to 2020 is considered to have had a moderate, neutral, permanent effect in terms of land use at the Application Site;
- Demographic effects: It is considered that from the baseline year of 1988 to 2020, activity at the Application Site would have resulted in a moderate, positive, long-term effect in terms of demographic effects;
- Economic effects: It is considered that activity at the Application Site resulted in a moderate, positive, long-term effect in terms of employment and economy;
- Property values: It is considered that any effects on property value in the area cannot be determined with confidence;
- Community facilities: It is considered that activities during the peat extraction phase would have resulted in moderate, positive, long-term effects on community facilities;
- Tourism and recreation: It is considered that activities at the site would have resulted in a not significant, neutral, long-term effect on tourism and recreation in the area.

In terms of human health, the effects of the industrial peat extraction, such as dust nuisance, noise, traffic, and visual effects, have been assessed in the relevant environmental chapters of the remedial EIAR and referenced in Chapter 6 Population and Human Health.

The effects on health of sensitive receptors in the local population are considered not significant, negative, temporary to medium term due to the distance between sensitive receptors and the extraction areas and also given the seasonal nature of the activity.

## 6.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

In terms of population, the effects of the Current Phase on population receptors, such as land use, demographics, employment and economy, property, community facilities and tourism and recreation, were reviewed and assessed, and have been summarised below:

- **Demographic effects:** While the cessation of peat extraction resulted in a reduction in employment at the Application Site, the scale of job losses was relatively limited in the context of the wider local labour market. Accordingly, any associated changes in population or housing are considered to have been negligible.
- **Economic effects:** The Current Phase has resulted in job losses and has had a slight negative impact on the local population. It is therefore considered that the Current Phase at the Application Site resulted in slight negative, short-term effect in terms of employment and the local economy.
- **Property value:** As property values are affected by numerous external factors, a direct relationship between the Current Phase of the Application Site and local property values cannot be determined. Therefore, no significant effect on property values is predicted.
- **Tourism and recreation:** Given the limited interaction between the Current Phase and tourism or recreational receptors it is considered that activities during the Current Phase (2020-present day) would have resulted in a Not Significant, Neutral, Long-Term effect on tourism and recreation in the area.

In terms of human health, the effects of the industrial peat extraction, such as dust nuisance, noise, traffic, and visual effects, have been assessed in the relevant environmental chapters of the remedial EIAR and referenced in Chapter 6 Population and Human Health.

Since peat extraction ended in 2020, activity and associated vehicle movements at the site has been greatly reduced. Remaining peat stockpiles were removed in 2021 and decommissioning works are ongoing in accordance with the IPC licence.

Temporary dust, noise and vibration from these activities were limited and are not considered to have caused significant effects on nearby residents. Water management measures, including the maintenance of silt ponds, continue to protect surrounding watercourses, and no significant effects on local water resources have been identified.

Overall, the Current Phase is considered to have had a slight, positive, long-term effects on human health.

## 6.3 REMEDIAL PHASE

The Remedial Phase is being undertaken in accordance with Condition 10.2 of the IPC Licence (P0501-01) and involves the implementation of a Cutaway Bog Rehabilitation Plan. The plan supports the decommissioning, rehabilitation and restoration of the peatland in line with Bord na Móna's decarbonisation strategy. The stabilisation of peatlands will support future development of these lands. It is intended to seek planning consent for a renewable energy development on the Application Site, herein referred to as Derrygreenagh Wind and Solar project, subject to separate planning consent.

A third party intends to develop infrastructure at lands within the Application Site, consistent with the Government's Large Energy User Action Plan (LEAP), and which will be subject to separate planning and regulatory consent as appropriate.

During the Remedial Phase, employment at the Application Site will reduce from approximately 20 to 6 permanent staff. This represents a small reduction in employment and associated economic activity. Given the limited number of jobs affected, the overall effect on the local population and economy is considered to be slight, negative and short-term. As previously stated, there are no residential receptors within the Application Site. Therefore, no significant effect on property values is predicted.

Peatland rehabilitation will provide environmental and landscape benefits, including improved biodiversity and water quality and reduced carbon emissions. These improvements are expected to have a minor positive effect on local tourism and recreation, including at Croghan Hill.

The rehabilitation works are expected to provide several environmental benefits, including improved water quality, enhanced biodiversity, reduced carbon emissions and improved landscape quality. Collectively, these benefits support human health and wellbeing by contributing to a healthier environment.

The rehabilitation of the peatlands may also support future sustainable development opportunities at the site, helping to deliver long-term environmental and community benefits.

Overall, the Remedial Phase is expected to have a slight, positive, long-term effect on human health.

## 6.4 RESIDUAL EFFECTS

### 6.4.1 Peat Extraction Phase (1988-June 2020)

Peat extraction and ancillary activities have been regulated by the EPA under IPC Licence P0501-01 since 2000. The change in land use between 1988 and the cessation of peat extraction in 2020 resulted in a moderate, neutral, permanent effect on land use.

Increased mechanisation and improved operational practices reduced the number of staff required over time. Since 2000, environmental controls and monitoring required under the IPC Licence have limited effects on the local population, resulting in an imperceptible, neutral, long-term effect.

The IPC licence controls and associated environmental measures have also helped protect human health. Overall, the effects on human health are considered not significant, negative and long-term.

### 6.4.2 Current Phase (June 2020-Present Day)

Following the cessation of large-scale peat extraction at the Application Site in June 2020 and the continued implementation of the environmental controls and monitoring requirements under IPC Licence P0501-01, the Current Phase has resulted in an imperceptible, positive, long-term effect on population, supported by ongoing environmental controls and monitoring. These

measures have also supported the protection of human health, with the Current Phase considered to have resulted in imperceptible, positive, long-term effect.

### 6.4.3 Remedial Phase

The Remedial Phase will reduce direct employment at the Application Site from approximately 20 to 6 staff, resulting in a slight negative effect on local employment. However, peatland rehabilitation will support opportunities for future renewable energy, recreation, biodiversity, tourism and other land uses, with potential longer-term benefits for the local economy. Overall, the effect on population is considered slight, negative and long-term.

The rehabilitation works will be temporary and localised, with appropriate environmental controls in place to minimise potential effects on human health. In the longer term, improved environmental quality, reduced dust emissions, enhanced biodiversity and increased amenity value are expected to result in a slight, positive, long-term effect on human health.

The transition from peat extraction has reduced direct employment at the Application Site. However, future land uses and associated employment opportunities, together with continued recreational and tourism opportunities, have the potential to support the local economy and community over the longer term.

## 7 BIODIVERSITY

Chapter 7 (Biodiversity) of the remedial EIAR presents the findings of a remedial assessment of the effects on biodiversity (both in isolation and cumulatively with other projects and plans) resulting from Bord na Móna's peat extraction and ancillary activities, ongoing decommissioning and management activities, and proposed rehabilitation measures at the Application Site.

To inform the assessment of the ecological impacts of the Project required for the remedial EIAR, a range of desktop studies, scoping exercises, consultations, and multidisciplinary field surveys were conducted to gather ecological data on the Application Site and its surrounding area, to establish baseline ecological conditions in July 1988 and the present day.

The desktop studies involved a thorough review of ecological data from multiple sources, including Bord na Móna habitat surveys and Draft Cutaway Decommissioning and Rehabilitation Plans for the five bogs, aerial imagery and historical maps, National Parks and Wildlife Services (NPWS) records, national biodiversity databases, and relevant environmental reports.

These desktop studies informed a series of scoping exercises and consultations conducted as part of the EIA process in 2023 and again in 2026, engaging key consultees, including NPWS.

A comprehensive suite of ecological surveys, conducted between 2023 and 2026, was used to identify the presence or likely presence of habitats and protected species within the Zone of Influence of the Project, establishing the ecological baseline for the Application Site. These surveys, which cover various aspects of biodiversity such as flora, fauna, aquatic environments, birds, and invasive species, provided the necessary data to assess the impacts of past peat extraction, current and ongoing activities, and the future activities proposed in the Draft Cutaway Decommissioning and Rehabilitation Plans.

Once the ecological baselines were established, the value of key ecological receptors characterising the baselines were determined, and the likely significant effects of the Peat Extraction Phase, Current Phase and Remedial Phases were assessed.

### 7.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

The Peat Extraction Phase covered the period from July 1988 to July 2020. By 1988, land use at the Application Site was well-established as industrial milled peat extraction, there was extensive drainage infrastructure installed on the site, with the Application Site drained close to its maximum extent. There was limited drainage inserted on a further c. 20.8ha (i.e. 0.79% of the Application Site area) between 1988 and 2004, with the area subject to drainage remaining the same until the cessation of peat extraction in 2020. Although drainage infrastructure had been installed across substantial areas of the Application Site by 1988, some areas remained neither drained nor subject to peat extraction.

## 7.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

. The Current Phase covers the period from cessation of peat extraction in June 2020 to the present day. Since extraction ceased, activities have focused on decommissioning and rehabilitation in accordance with Condition 10 of the IPC Licence.

Decommissioning is ongoing and currently focuses on peat stockpile removal, which was completed in 2021. Other infrastructure including a rail track are part of the decommissioning work. Approximately 20.6 km of permanent rail track originally within the Application Site, 2.1 km has been removed from the southern section of Derryarkin Bog, with the remaining 18.7 km to be decommissioned under the wider decommissioning plan.

Since peat extraction ceased, there has been no new peat extraction, drainage or vegetation clearance. Some habitat recovery has occurred, particularly within transitional habitats. Decommissioning activities have been restricted to areas previously disturbed by peat extraction, avoiding new, undisturbed habitats. Consequently, no additional significant negative effects on habitats have occurred. Taking a precautionary approach, the potential effect on habitats is assessed as long-term, moderate and positive.

In addition, the cessation of extraction has substantially reduced the potential for suspended sediment, nutrients and other pollutants to enter surface water and groundwater. Existing drainage infrastructure, including drains, silt ponds, discharge outlets and pumped drainage, remains in operation. While limited risks remain from accidental spills and wastewater discharges, these are significantly reduced compared with the Peat Extraction Phase. A review of 21 Annual Environmental Reports since 2020 identified no exceedances of suspended solids emission limits.

## 7.3 REMEDIAL PHASE

Under Condition 10.2 of IPC Licence P0501-01, Bord na Móna is required to prepare Cutaway Bog Decommissioning and Rehabilitation Plans for the long-term rehabilitation of the licensed bogs. The plans for the Application Site form Phase 3 of the Remedial Phase (Future) and provide for a phased approach to rehabilitation.

The primary objective is environmental stabilisation and placing the cutaway bogs on a long-term trajectory towards naturally functioning peatland ecosystems. Rehabilitation will combine active measures with natural colonisation and vegetation succession. Environmental stabilisation is expected in the short to medium term, while development of fully functional wetland and peatland ecosystems is expected to take approximately 30–50 years.

Key rehabilitation measures will include re-wetting, drain-blocking, cell bunding, peat field reprofiling and natural colonisation. Water levels will be maintained as close as practicable to the peat surface while avoiding extensive open-water bodies. Natural colonisation will help stabilise bare peat, reduce erosion and surface runoff, and increase habitat diversity. Targeted re-vegetation may be undertaken where natural regeneration is limited.

Baseline ecological surveys will be undertaken before the rehabilitation plans are finalised and submitted to the EPA. These will assess natural colonisation, opportunities for targeted re-vegetation and re-wetting, and site-specific measures required for long-term environmental stabilisation.

The majority of the Application Site is unlikely to develop into active raised bog similar to the priority EU Habitats Directive Annex I habitat within approximately 50 years. Only a small area is expected to support Sphagnum-rich habitats within this timeframe. However, re-wetting across the site is expected to improve habitat conditions and promote a mosaic of peatland habitats suited to local environmental conditions.

## 8 LAND SOILS AND GEOLOGY

This chapter reports on the results of assessment of any likely significant effects on Land, Soils and Geology as a result of peat extraction and ancillary activities at the Application Site during the Peat Extraction Phase, Current Phase, and the Remedial Phase.

The main considerations when assessing the effects of peat extraction on land, soils and geology, based on guidance from the Irish Geological Institute (IGI, 2013) and the Environmental Protection Agency (EPA, 2022), are changes to land use, the geological environment and peat stability.

A desk study was carried out between January and May 2026 to review relevant background information for the Application Site and surrounding area. The assessment focuses on land, soils and geology within the Application Site, with a study area extending 2 km beyond its boundary.

Soils, subsoils, bedrock and other geological features were assessed using desk study information, site investigation data and site walkovers. Site walkovers were carried out on 11 May 2023 and 15 April 2026 to confirm historical and geological information and assess current conditions.

Additional site investigations were carried out near the Application Site, including trial pits and boreholes in 2015 and 2023. Peat depth surveys were also carried out between 1985 and 2019. All relevant information is included in Appendix 8-1 of Chapter 8 of the remedial EIAR.

### 8.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

By 1988 industrial peat extraction by Bord na Mona was well-established at the Application Site. Drainage was fully inserted in 1988 with peat extraction commencing in 1958. Derryhinch drainage features remained the same until peat extraction ceased in 2017, while Drumman Bog ceased in 2018. Peat extraction in Derryarkin Bog ceased between 1988 and 1991 and the number of drainage features remained the same at Derryarkin Bog up to the peat extraction ceased. Drainage had been fully inserted in Toar Bog and Ballybeg by 1988 and drainage features on site remained the same until peat extraction in 2018 and 2020 respectively.

#### 8.1.1 Effects on Land (Change of Land Use)

Land and land-use changes at the Application Site were reviewed between 1988 and 2020. The soils/land at the Application Site had already been significantly altered and ancillary structures already in place. In 1988 these areas were utilised for industrial peat extraction with landcover consisting of drained bare or vegetated peat fields separated by field drains. The historical extraction of peat did not result in a loss of peat habitat where the peat was already exposed and had little or no vegetation.

The baseline sensitivity of the receiving land use has been assessed as Low on the basis of there being no removal of raised bogs (post-1988) in the context of the Application Site. Due to the low sensitivity and limited change in land use during the Peat Extraction Phase, the potential effects on land use are considered not significant and medium term.

### 8.1.2 Effect on Contamination of Soil

There was no widespread contamination of soil at the Application Site as the machinery and equipment were well maintained and that if any spills did occur, they were localised. If the correct preventative measures were not put in place leakages and spillages could have altered the peat and soil geochemistry.

Following a review of available AER (Annual Environmental Reports submitted to the EPA under the IPC licences) it can be concluded that no significant pollution events/spills to groundwater have occurred since 2000 (surface water is dealt with separately in this remedial EIAR). Furthermore, following a review of the available data on the EPA website in relation to pollution and water quality of the surface water features at the bogs, had such an event occurred prior to the year 2000, the effects were either insignificant or slight and short-term.

### 8.1.3 Effect on Geological Heritage

There are no Geological Heritage sites within the Application Site. Based on the review of the information there is no potential for impact on geological heritage at the site.

### 8.1.4 Effect on Peat Stability and Failure

There are no records of peat instability or peat failure at the Application Site or surrounding area, and the shallow peat depths, gentle slopes and maintained drainage system mean that the risk of large-scale peat failure is considered negligible.

## 8.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

Since peat extraction stopped in June 2020, peat stockpiles and loose peat have been removed from the Application Site and vegetation has started to naturally return. Much of the site remains bare peat or early-stage cutaway habitat.

### 8.2.1 Effect on Land and Land-Use

Following the cessation of peat extraction in June 2020, the Application Site is no longer used for commercial peat extraction.

The bogs are no longer the site of extensive peat extraction, and the Current Phase of peat extraction activities will have a positive effect on land and land-use.

In terms of the land itself the Current Phase will have a slight positive effect on the landscape of the bog as peat layers are no longer being stripped for extraction and extraction and redundant infrastructure around the bogs will be removed. There are no significant effects during the Current Phase on land and land-use.

### 8.2.2 Effect on Contamination of Soil

The Current Phase is being carried out in accordance with the IPC Licence and includes measures to decommission and safely manage infrastructure and materials to prevent environmental pollution.

Although limited machinery and site activity remain, there is a reduced risk of fuel spills and wastewater discharges compared with the Peat Extraction Phase. Fuel storage and refuelling procedures are subject to appropriate controls.

Based on the absence of significant contamination events at the Application Site, the effects were insignificant or slight, short-term and reversible.

### 8.2.3 Effect on Geological Heritage

There are no Geological Heritage sites within the Application Site. Based on the review of the information there is no potential for significant effects on geological heritage at the Application Site.

### 8.2.4 Effect on Peat Stability and Failure

No peat extraction has occurred at the Application Site since 2020, and there has been no significant change to the site's topography or drainage. While some redundant infrastructure, including railway tracks, will be removed, the railway embankments will remain in place. There are no recorded instances of peat instability or landslides at the Application Site. Given the flat nature of the site, the Current Phase is considered to have a negligible effect on peat stability.

## 8.3 REMEDIAL PHASE

This section presents an assessment of likely significant effects resulting from Bord na Móna's Draft Cutaway Bog Decommissioning and Rehabilitation plans for the Application Site on the land, soils and geological environment. Industrial peat extraction has now ceased, and decommissioning and rehabilitation measures are being implemented.

### 8.3.1 Change of Land Use

Industrial peat extraction has ceased, with peatland rehabilitation and other decarbonisation measures now being implemented.

Rewetting, natural revegetation and the establishment of native woodland will provide long-term environmental benefits and contribute to national climate targets. The rehabilitated peatlands are expected to develop into a mosaic of wetlands, scrub, heath and peatland habitats over approximately 30–50 years. The rehabilitation measures will stabilise the former extraction areas and support their transition to alternative land uses.

Overall, the Remedial Phase is expected to have a Not significant, Positive, Direct and Long-term Effect on land use. All rehabilitation works will be carried out in accordance with the EPA licence.

### 8.3.2 Effect on Contamination of Soil

The storage and use of fuel and small quantities of chemicals presents a potential risk of spills and leaks. Effective controls are in place in accordance with the EPA licence to minimise this risk. With these measures in place, effects on peat, subsoil or bedrock are anticipated as Not Significant. Therefore, residual effect is considered Imperceptible, Direct, Short-term and Unlikely.

### **8.3.3 Effects on Geological Heritage**

No significant effects were identified. There are no geological heritage sites present on the site. No additional mitigation is required.

### **8.3.4 Effect on Peat Stability and Failure**

The Remedial Phase will stabilise and revegetate the peat surface. No peat will be removed and no new drainage will be installed, meaning the risk of peat failure will remain very low. No significant peat instability has been recorded at the Application Site. Overall, the Remedial Phase is expected to be Not significant on peat stability.

## 9 HYDROLOGY, HYDROGEOLOGY & WATER QUALITY

Chapter 9 of the remedial EIAR reports the findings of a remedial assessment of likely significant effects on Hydrology, Hydrogeology and Water Quality as a result of peat extraction and associated activities at the Application Site.

The baseline against which the environmental effects of the development required to be assessed has therefore, been identified as being the position as of July 1988. The baseline environment has been established by a desk-based study including, but not limited to, such information sources as the (IPC) Licence, extraction records, Bord Na Móna databases on peat depth and drainage. Bord na Móna has been undertaking surveys and site monitoring as part of the requirements of their IPC Licence since 2000.

### 9.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

Due to the fact that drainage of the peatland occurred in the 1950s and peat extraction commenced across all areas by 1958, the main effects of draining the Application Site occurred around 30 years prior to 1988. Drainage from the Application Site was regulated by limiting discharges via drainage design, and specifically by routing all drainage via field drains, main drains, headland drains, then to silt ponds to outfalls, with final discharge to natural watercourses. In some areas, pumps assist with the discharge of surface water in this hierarchy.

#### 9.1.1 Effects of Drainage on Bog Hydrogeology and Downstream Surface Water Hydrology

The effects on drainage (hydrology) and bog hydrogeology between 1988 and 2020 are characterised by small annual changes in topography (ground levels reducing) as peat was extracted, with minimal additional changes in baseline hydrology or hydrogeology.

Drainage from the Application Site was regulated by limiting discharges via drainage design, and specifically by routing all drainage via field drains, main drains, headland drains, then to silt ponds to outfalls, with final discharge to natural watercourses. In some areas, pumps assist with the discharge of surface water in this hierarchy.

Overall, the maintenance of bog drainage between 1988 and 2020 would have had a slight to moderate negative effect on the hydrology and slight negative effect on the hydrogeological environment.

#### 9.1.2 Effects on Designated Sites

Groundwater and surface water from the Application Site drain to surrounding watercourses and have the potential to influence nearby designated ecological sites. Assessments were undertaken to determine whether peat extraction activities affected these sites.

A potential connection was identified between the Application Site and the Boyne and Blackwater SAC. However, water quality monitoring and assessments showed that any effects during the peat extraction period were not significant.

Raheenmore SAC is separated from the Application Site by local topography and has no hydrological or hydrogeological connection to the site. Similarly, the Grand Canal pNHA has no water-related connection with the Application Site, and no effects were identified.

Part of the Application Site lies within the wider Shannon and Barrow catchment. However, detailed assessments of ecological, hydrological and water quality information found no evidence that peat extraction activities have adversely affected any European designated sites.

Environmental management measures were in place throughout the peat extraction period and were strengthened following the introduction of the IPC Licence in 2000. These measures included water quality protection, sediment control and pollution prevention practices.

Based on the assessments undertaken, no significant adverse effects on the integrity of any European site have occurred, or are expected to occur, as a result of peat extraction activities at the Application Site.

### 9.1.3 Effects on Groundwater / Surface Water Abstractions

The Toberdaly groundwater abstraction, located outside the Application Site, was used during the Peat Extraction Phase but ceased in 2003 following the closure of the Rhode Power Station. Toberdaly continues to provide a public water supply.

No nearby groundwater or surface water abstractions are considered to have been affected by peat extraction. Groundwater quality at Toberdaly is reported as good, and effects on groundwater quality or supplies from suspended solids, nutrient releases, and accidental spillages associated with the Application are identified as Not Significant. Although part of the Toberdaly Source Protection Zone overlaps the Application Site, no source–pathway–receptor connection has been identified and no likely significant effect is anticipated.

### 9.1.4 Effects on Local Groundwater Wells/Supplies

Peat extraction had the potential to affect local groundwater levels and recharge patterns through drainage of the bog. However, the characteristics of the Application Site, including generally low groundwater vulnerability and low groundwater recharge rates, limited the potential for significant impacts.

Any fuel or hydrocarbon spills were more likely to discharge to nearby surface water than the underlying bedrock aquifer. No karst features have been identified within or near the Application Site. Overall, the effect on local groundwater supplies is considered Not Significant and Medium-term.

### 9.1.5 Effect on Water Quality

Water quality in the area has remained generally stable and moderate to good since 1988. EPA monitoring since 2000 indicates that water quality in the Mongagh and Yellow catchments has generally remained good, with no significant long-term deterioration associated with peat extraction.

Since 2000, peat extraction was regulated under IPC Licence P0501-01, which required monitoring, discharge limits and measures such as silt ponds and sediment controls to protect water quality.

Overall, while peat extraction was a pressure on local streams, it is considered that it did not have a significant effect on overall water quality in the Castlejordan Yellow\_010 Subcatchment.

## 9.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

The Current Phase includes the period of time between the cessation of peat extraction at the Application Site in 2020 to the present day. Decommissioning of the peat extraction activities is currently underway across the Application Site in accordance with Condition No. 10 of the IPC Licence.

During the Current Phase, the Application Site has operated in accordance with its IPC Licence requirements. Silt ponds are maintained and cleaned, and surface water discharge volumes remain similar to those during the Peat Extraction Phase. No additional measures are considered necessary, as the IPC Licence conditions are designed to protect groundwater and surface water. The effects on bog hydrogeology, downstream surface water, groundwater abstractions or water quality are considered not Significant.

Decommissioning of peat extraction infrastructure is ongoing in accordance with the IPC Licence, including the removal of tanks, waste and other materials that could cause environmental pollution. Waste is removed for recycling or disposal by appropriately permitted contractors, with audits carried out as required. Water used at the Application Site is supplied from the Toberdaly Public Water Scheme which is supplied from groundwater boreholes, while wastewater from the Derrygreenagh Works (located outside the Application Site boundary) is treated through an on-site septic tank and percolation system. The Application Site will continue to operate under the IPC Licence, with measures in place to protect water quality and prevent contamination. Decommissioning, rehabilitation and waste management activities will be carried out in accordance with EPA requirements and monitored until the licence is surrendered.

Overall, no significant effects have occurred or are predicted in relation to hydrology and hydrogeology during the Current Phase.

## 9.3 REMEDIAL PHASE

During the Remedial Phase the Application Site will operate in accordance with IPC Licence requirements until such a time as the licence is surrendered. Silt ponds will be maintained as required. The draft Cutaway Bog Decommissioning and Rehabilitation Plans aim to rehabilitate the bogs of the Application Site. The Application Site cannot be restored back to raised bog, as the majority of peat has been removed and the environmental conditions have been modified.

The draft Cutaway Bog Decommissioning and Rehabilitation Plans, and the delivery of peatland rehabilitation by Bord na Móna is expected to have a positive impact on water quality and will help the deliver its objectives in relation to the Water Framework Directive and is one of the five key actions. The Remedial Phase of the bog's life cycles will further stabilise the remaining peat deposit and set it on a path to rehabilitation. Based on the Decommissioning and Rehabilitation Plans, this process will improve the conditions of the bogs and resulting in reduced effects on hydrology and hydrogeology. The Remedial Phase effect on hydrology, hydrogeology and water quality is considered slight to moderate, direct, long term and positive.

## 10 AIR QUALITY

Chapter 10 of the remedial EIAR describes and assesses the residual direct and indirect air quality effects of the peat extraction and ancillary activities, at the Application Site. The air quality impact assessments have been prepared for the Peat Extraction Phase, the Current Phase and Remedial Phase. The baseline environment has been prepared with reference to published air quality data from the EPA.

For the purposes of this assessment, while the activities associated with the Project assessed have occurred in the past, beginning in 1988 and continuing to present day and future Remedial Phase, impacts have been assessed against the most recently published air quality standards which are likely more stringent than historical standards from previous years. Therefore, if it can be determined that, based on the most recent standards, no significant effects occurred as a result of the Project, then it is unlikely that significant effects occurred based on historical standards.

The baseline environment of 1988 has been established with reference to published air quality data from the EPA. Historic air quality monitoring data from the EPA for pollutants such as nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns (PM<sub>10</sub>) and particulate matter less than 2.5 microns (PM<sub>2.5</sub>) for representative rural locations was reviewed. The air quality in the region of the Application Site is of generally good quality with concentrations of pollutants below the ambient air quality standards. Historic dust monitoring results and previous dust related complaints were reviewed in order to establish the baseline dust conditions of the Application Site. Air quality has continued to improve in recent years as a result of the implementation of on the most recent standards.

### 10.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

During the Peat Extraction Phase, dust, bog fires and vehicle exhausts had the potential to affect local air quality and nearby people. However, the area was considered to have low sensitivity to dust, and the overall risk from dust soiling and health impacts was assessed as low. Dust control measures were required under the site's IPC licence, and monitoring showed that dust emissions were occasionally elevated but were insignificant most of the time.

Bog fires during the Peat Extraction Phase were recorded at the site in 2013. Bog fires could have temporarily affected air quality through ash emissions, but because they were infrequent and short-lived, the air quality impacts were considered not significant.

Dust emissions during the Peat Extraction Phase had a long-term, localised, negative and slight impact on air quality which is overall Not Significant.

Vehicle exhaust emissions from vehicles accessing the Application Site had the potential to impact air quality. The historical traffic figures were reviewed, and it was determined that the traffic generated during the Peat Extraction Phase had a not significant impact on the local traffic flows in the context of the air quality assessment.

Overall, the impact on air quality from peat extraction was considered long-term, negative, localised and slight, but not significant.

## 10.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

During the Current Phase, the remaining peat stockpiles were removed from the Application Site and transported off site and was completed in 2021. Dust could have been generated during this work however, the dust control measures required under the IPC licence were in place. Given the limited works and the low number of sensitive receptors, any dust emissions were predicted to be imperceptible.

There was one fire incident during the Current Phase which occurred at Drumman Bog in July 2026 and was reported to the EPA in July and August 2026 (incident number INCI033357). Due to the short-term and infrequent nature of the bog fires, air quality impacts are not predicted to have been significant.

The Current Phase involved a low number of vehicles and machinery, and emissions from their exhausts were therefore predicted to have an imperceptible effect on air quality.

Overall, the current phase was assessed as having a short-term, negative and imperceptible residual effect on air quality, which is Not Significant in EIA terms.

## 10.3 REMEDIAL PHASE

During the Remedial Phase, only limited works are proposed that have the potential to effect air quality. The main activities will include re-vegetation of the Application Site, blocking drains and re-wetting the bogs where possible.

There is a low risk of dust being generated during these works, which could result in dust settling on surfaces or potential effects on human health. Any effects from dust emissions are expected to be short-term, negative and imperceptible.

Emissions from machinery and vehicles accessing the Application Site are expected to have a neutral effect on air quality due to the low number of vehicles involved.

Overall, the Remedial Phase was assessed as having a long-term, negative and imperceptible residual effect on air quality, which is Not Significant in EIA terms.

## 11 NOISE AND VIBRATION

Chapter 11 of the remedial EIAR describes and assesses the residual direct and indirect noise and vibration effects of the peat extraction and ancillary activities, at the Application Site. The noise and vibration impact assessments have been prepared for the Peat Extraction Phase, the Current Phase and the Remedial Phase.

Reference is made to the noise survey carried out at the Ballykeane, Killinagh, Esker and Pollagh bogs to determine baseline noise levels in the receiving environment. Although not measured at the Application Site, the noise levels are representative of the rural environment which surrounds the Application Site.

The assessment of noise and vibration due to onsite activity has been conducted in accordance with best practice guidance contained in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise.

### 11.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

The noise assessment concluded that noise emissions and vibration generated during the Peat Extraction Phase were not significant as only in a very limited number of areas, the peat extraction activity had the potential to be within 200 m of a noise-sensitive location. The potential effects at the nearest noise sensitive associated with the Peat Extraction Phase are described as negative, not significant and long-term.

Peat extracted from the Application Site was transported using a combination of Bord na Móna's internal industrial rail network and heavy goods vehicles (HGV's) on the public road network. In terms of the additional traffic on local public roads due to activity on site, the effects at the nearest noise sensitive were neutral, not significant and long term.

Vibration from industrial rail wagons and machinery during the Peat Extraction Phase are assessed as negative, not significant and long-term.

### 11.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

Peat extraction ceased in June 2020. Decommissioning is underway across the site and includes removal of rail tracks and materials from site.

The potential effects at the nearest noise sensitive location associated with the Current Phase are described as negative, not significant and short-term.

In terms of the additional traffic on local public roads due to activities on site during the Current Phase, the effects at the nearest noise sensitive were assessed as neutral, not significant and long-term. Vibration from industrial rail wagons and machinery during the Current Phase are assessed as negative, not significant and long-term.

### 11.3 REMEDIAL PHASE

The main activities for the rehabilitation works will include the blocking of drains in the bog in general and the ploughing of gravel slopes. Predicted noise levels are likely to be lower than those predicted for the decommissioning phase as works will be localised and short-term. No

significant noise effects are likely at noise-sensitive locations. Similarly, vehicle movements to and from the site will be minimal.

Given the nature of the works discussed above, no vibration effects are expected at off-site locations.

## 12 LANDSCAPE & VISUAL

Chapter 12 of the remedial EIAR determined the landscape and visual effects that have occurred (or are likely to occur) during the Peat Extraction Phase, the Current Phase, and the Remedial Phase.

Landscape assessment relates to changes in the physical environment, brought about by a development, which may alter its character. Visual Impact Assessment relates to changes in the composition of views as a result of changes to the landscape, how these are perceived and the effects on visual amenity. Such impacts are population-based, rather than resource-based, as is the case of landscape impacts.

On balance of the geographical extent of likely landscape and visual effects and the need for a proportionate yet robust assessment, a 5 km radius Study Area for the remedial Landscape and Visual Impact Assessment (LVIA) was used for the assessment.

Given that peat extraction had been long established and was underway across the expanse of the Application Site by 1988, the landform, land cover and drainage would have appeared much the same at the baseline date as at present day.

### 12.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

In terms of landscape effects, there was a broad-scale and comprehensive physical landscape impact on the bogs from the extraction operations. In combination with the extraction activities and associated transport infrastructure, this would have contributed to an industrialisation of the previously naturalistic bog landscape, but most of this had already occurred prior to 1988. For this reason, the landscape impacts of the Peat Extraction Phase from 1988 to cessation in 2020 are considered Not Significant.

In terms of visual impacts, in 1988 peat extraction and ancillary activities would have been at peak extraction during the summer months and a considerable portion of the bog had been cutaway or drained and prepared for extraction. Visual impacts would have related to movement of workers and machinery, transport and transport infrastructure, as well as accommodation and welfare facilities. From most receptor locations it is likely that the full extent of the Application Site was not visible as there are relatively few open views across the bogs from the public realm.

From most locations, it was unlikely that the full extent of the cutaway peatland could be seen. Visual effects were generally limited to the nearest areas of the bog.

More noticeable visual effects would have occurred from sections of the R400 regional road between Drumman and Derryarkin bogs, the R446 between Kinnegad and Tyrellspass, and the local road along the southern edge of the latter.

However, given the existing landscape and the long-established nature of large-scale peat extraction during the summer months, significant visual effects between 1988 and the cessation of peat extraction in 2020 were not considered likely.

Overall, the visual effect was assessed as slight, which is not significant in EIA terms..

## 12.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

The current phase from 2020 to the present day, following the cessation of peat extraction works, represents lesser landscape and visuals effects, which are not deemed to be significant.

Decommissioning works began following the cessation of peat extraction activities in June 2020. These works were required under the IPC Licence and agreed with the EPA.

- The decommissioning works relevant to landscape and visual effects included:
- Cleaning up remaining waste and materials from the bogs, yards, buildings and offices.
- Cleaning silt ponds.
- Removing remaining peat stockpiles.
- Removing buildings, fuel tanks, septic tanks, pumps and compounds.

These were minor clean-up works within the existing cutaway peatland landscape. The removal of infrastructure and waste materials resulted in positive effects on the landscape and visual setting. The works also provided ecological benefits that contribute to the landscape character and visual amenity.

Overall, the resulting effects are assessed as being of a Low magnitude and Positive quality, giving rise to a Slight Positive significance.

## 12.3 REMEDIAL PHASE

The remedial phase involves the rewetting of bogs and establishment of biodiversity measures which will have a positive effect on the landscape and visual setting.

Draft Cut away Bog Decommissioning and Rehabilitation Plans have been prepared for Derryhinch, Derryarkin, Drumman, Ballybeg and Toar Bogs. The works will include drain blocking, water level management, modification of outfalls and the gradual removal of infrastructure.

These measures will support the transition from the existing post-industrial peat extraction landscape to a more natural landscape of wetlands, scrub and woodland. Natural vegetation will reduce exposed peat and increase landscape diversity. Some existing forestry, quarrying and infrastructure will remain.

There will be some short-term, localised disturbance during the works. Over the medium and long term, vegetation will become established and the bogs will develop into more stable, semi-natural landscapes with improved visual quality and amenity.

Overall, the rehabilitation works will have positive landscape and visual effects, through the restoration of natural landform patterns, reduction of visually intrusive features and increased landscape diversity. Some visual contrasts will remain where existing land uses are retained. The medium- and long-term effects are assessed as Moderate-slight and Positive, with a Medium magnitude of impact

## 13 CULTURAL HERITAGE

Chapter 13 of the remedial EIAR presents the results of a cultural heritage impact assessment of the historical peat extraction and all associated ancillary works at the Application Site during the Peat Extraction Phase, the Current Phase, and the Remedial Phase.

The assessment reviewed the archaeological and historical background of the Application Site using existing records from Counties Meath, Westmeath and Offaly, including the Record of Monuments and Places, National Museum of Ireland records, historical maps and documents, and aerial and satellite imagery from the Ordnance Survey and Google Earth. It identifies the archaeological, architectural and cultural heritage within the Application Site and surrounding study area, as far as reasonably possible. The study area covered the Application Site and a 200 m distance from the Application Site boundary.

Field inspections were carried out to identify known and previously unrecorded archaeological and cultural heritage features within the Application Site. Inspections were undertaken on 25 January 2023 and 18 March 2026. The findings were reviewed as part of the assessment.

Consultation was also carried out in June 2026 with relevant government departments, local authorities and heritage organisations to gather further information on the cultural heritage of the Application Site and surrounding area.

### 13.1 PEAT EXTRACTION PHASE (JULY 1988-JUNE 2020)

Between 1988-2020, a total of 606 previously unrecorded archaeological sites were identified during peatland surveys with many subsequently added to the Record of Monuments and Places (RMP) or Sites and the Monuments Record (SMR). The RMP is a list of archaeological sites known to the National Monuments Section, which are afforded legal protection under Section 12 of the 1994 National Monuments Act and are published as a record. On the other hand, the SMR contains information on known archaeological sites and monuments, based on documentary evidence and field inspections. It also includes some sites and monuments where the exact location is not known, but information such as the site type and townland has been recorded.

Numerous archaeological artefacts have also been recorded in the Application Site. Peat extraction and ancillary activities, including drains, milling, and extraction had a direct, permanent negative impact (of high or very high magnitude) on the cultural heritage resource within the Application Site. It is likely that the significance of effect varied from significant to very significant.

The various acts (National Monuments Acts, Turf Development Acts 1946 - 1998 (section 56) and the 2012 Code of Practice) have afforded appropriate protection for the environment and archaeological heritage.

#### Sub-Surface Archaeology

Bog landscape features were often utilised throughout all periods of history, and the anaerobic conditions preserve organic matter, such as wood and leather, which does not often survive in more usual terrestrial archaeological conditions. Objects can be preserved in peatlands because of the acidity of peat and the anaerobic environment which exists within peatland deposits.

The peatland surveys, within the Application Site, allowed for the identification of any finds, features or deposits on either the peat fields, or along drain sections which led to mitigatory investigations and excavations in selected areas within the Application Site.

#### **Built Heritage (Protected Structures)**

No protected structures, nor structures listed in the National Inventory of Architectural Heritage (NIAH) are located in the Application Site or study area. The closest NIAH structure is a bridge (NIAH 15403403) in Rattin townland located approximately 2.1 km to the east. As such, no direct or indirect impacts are predicted on same, and no control or mitigation measures are required.

### **13.2 CURRENT PHASE (JUNE 2020- PRESENT DAY)**

Peat extraction at the Application Site ceased in 2020, and the site remains subject to IPC Licence P0504-01. Decommissioning and rehabilitation plans, including drain blocking and tracking over peat fields, may affect sub-surface archaeological remains within the Application Site. This includes the recorded stone enclosure at Ballybeg Bog (OF011-059), which was preserved at its original location following minimal investigation in 2014.

A 20 m buffer zone will be maintained around the stone enclosure and marked with temporary fencing to prevent accidental impacts from machinery and decommissioning activities.

If previously unknown archaeological material is discovered during the rehabilitation works, it will be avoided and reported to Bord na Móna's Archaeological Liaison Officer and the National Museum of Ireland. Any potential effects will be managed through the mitigation measures set out in the 2012 Archaeological Code of Practice.

Potential indirect effects on the settings of archaeological monuments and features of architectural heritage outside the Application Site have not been identified, as the decommissioning works are localised, low-lying and not expected to be visible from these monuments and structures.

### **13.3 REMEDIAL PHASE (FUTURE)**

The rehabilitation programme will be carried out under the IPC Licence and the 2012 Code of Practice. BnM intends to rehabilitate the bogs in phases. A 20 m buffer zone with temporary fencing will protect the recorded stone enclosure at Ballybeg Bog (OF011-059). Any previously unknown archaeological material found during the works will be avoided and reported to the BnM's Archaeological Liaison Officer and the National Museum of Ireland.

As the peat-related activities are covered by the 2012 Archaeological Code of Practice, any potential effects will be managed through the mitigation measures set out in the Code, in the same way as previous peat extraction activities and associated works.

## 14 MATERIAL ASSETS INCLUDING TRAFFIC & TRANSPORTATION

This chapter of the remedial EIAR assesses the likely significant effects of the historical peat extraction and ancillary activities on Material Assets. Following detailed EIA scoping and evaluation of the Project, the Material Assets brought forward for assessment in this chapter are Traffic and Transportation and Other Material Assets, namely Electricity, Water Supply Infrastructure, Wastewater Services & Infrastructure and Waste Management and Telecommunications & Aviation.

For Traffic and Transport, the roads considered in the assessment include the M6 Motorway, M6 Junction 3 at Rochfortbridge, the R400 Regional Road, the L1113, L1019, L1010 and L5010 local roads, as well as other local roads providing access to the individual bog units and associated infrastructure. The assessment considers the level of traffic associated with the Application Site and the sensitivity of the surrounding road network. Given the retrospective nature and scale of the application, the level of assessment is considered appropriate, and detailed traffic modelling was not required.

Historically, peat extracted from the Application Site was transported using Bord na Móna's internal rail network and HGVs on the public road network. Destinations varied over time and included power generation, briquette production and horticultural facilities. Due to the historic nature of the Project, limited historical staffing and traffic records are available. However, available operational and staffing information was used to estimate traffic movements for the assessment.

Electricity was supplied from the national grid, while water use was mainly associated with Derrygreenagh Works. Drainage infrastructure, including pumps and silt ponds, was in place across the bogs, and there was no connection to the public sewer network. Wastewater from the welfare facilities was treated by an on-site septic tank and percolation system. Overall, the Peat Extraction Phase had no significant effects on electricity, water supply, drainage or wastewater infrastructure.

There is limited information on telecommunications and no known impact on Aviation.

Bord na Móna was granted an IPC Licence for the Derrygreenagh Bog Group (within which the Application Site is located) in April 2000. Since the grant of the IPC Licence, control measures are in place to monitor emissions to water, protection of water and all waste materials are to be recorded, weighed, recycled or reused where possible, and removed from site by licensed contractors.

### 14.1 PEAT EXTRACTION PHASE (JULY 1988-JUNE 2020)

During the Peat Extraction Phase, traffic from the Application Site formed part of the wider traffic associated with surrounding extractive, industrial and rural activities. Traffic associated with the Application Site would have been lower if peat extraction had not continued. However, the assessment found that regular traffic from peat extraction represented approximately 7.5% of the reference traffic on the R400, which is below the 10% Transport Infrastructure Ireland (TII) screening threshold. This is considered a Low magnitude of impact under the assessment criteria adopted in chapter 14 of the remedial EIAR. The equivalent traffic level on the M6 was

less than 1%. Overall, the assessment indicates that peat extraction traffic did not materially affect the operation of the surrounding road network.

Having regard to the magnitude of traffic, the duration of the Peat Extraction Phase, the use of both rail and road-based transport and the characteristics of the receiving road network, the traffic and transportation effect associated with the Peat Extraction Phase is therefore considered to have been a long-term, Slight Negative effect, which is not significant in EIA terms.

During the Peat Extraction Phase, there were no significant effect on electricity, water supply, wastewater, telecommunications or aviation.

Waste was managed in accordance with the IPC Licence, with waste materials documented, weighed, recycled or reused where possible, and removed from the Application Site by licensed contractors; thus impacts on waste were considered to be slight and negative.

## 14.2 CURRENT PHASE (JUNE 2020- PRESENT DAY)

The R400 is considered a medium-sensitivity road. Traffic during the Current Phase has had a negligible impact on both the R400 and M6. Taking account of the temporary stockpile haulage, the intermittent nature of other activities and the relatively low level of traffic, the overall traffic effect is considered slight negative and not significant. Stockpile haulage ended in 2021, while other Current Phase activities continue at a low level.

The electricity supply infrastructure has remained unchanged during the Current Phase, and there is no residual or significant effect on electricity. Water is used at the Derrygreenagh Works (located outside the Application Site boundary) for machine washing, welfare and canteen facilities, and the site operates in accordance with the relevant IPC Licence conditions. The effect on water supply is considered short-term and imperceptible, with no significant effects identified. Wastewater from the Derrygreenagh Works is treated through an on-site septic tank, which is inspected and de-sludged annually. The effect on wastewater is short-term and imperceptible, with no significant effects identified. Waste is managed in accordance with the IPC Licence, with materials recorded, recycled or reused where possible and removed by licensed contractors. The effect on waste management is considered short-term, slight and negative. There is no residual significant effect on telecommunications or aviation.

## 14.3 REMEDIAL PHASE (FUTURE)

Traffic during the Remedial Phase is expected to have a negligible impact on the surrounding road network. While some additional HGV, contractor and machinery movements will occur during rehabilitation works, these will be intermittent and phased. Overall, the effect of Remedial Phase activities on traffic and transport is considered slight, negative and not significant.

During the Remedial Phase, there will be no residual or significant effects on electricity, water supply, wastewater, telecommunications or aviation infrastructure. BnM will continue to comply with the requirements of the IPC Licence. Wastewater will continue to be treated through the existing on-site septic tank and percolation system, and waste generated during the Remedial Phase will be minimal and will be removed from the Application site and recycled where possible.

## 15 CLIMATE

Chapter 15 of this remedial EIAR describes and assesses the residual direct and indirect climate impacts of the peat extraction and ancillary activities, at the Application Site. The climate impact assessments have been prepared for the Peat Extraction Phase, the Current Phase and the Remedial Phase.

For the purposes of this assessment, while the activities assessed have occurred over the past decades, beginning in July 1988 and continuing to present day, impacts have been assessed against the most recently published climate guidance and policies which are likely more stringent than historical policies from previous years. Therefore, if it can be determined that, based on the most recent standards, no significant effects occurred as a result of the Project, then it is unlikely that significant impacts occurred based on historical standards. The climate impact assessment comprised a quantitative assessment of the carbon emissions as a result of the peat extraction and ancillary activities.

Historic climate data was reviewed in reference to Ireland's weather for the surrounding area of the Application Site over the period July 1988 to present day. Climate is defined as the average weather over a period of time, whilst climate change is a significant change to the average weather. Climate change is a natural phenomenon but in recent years human activities, which have resulted in the release of GHGs, have impacted on the climate. Climate change has led to an increase in the frequency of extreme weather conditions such as storms, floods and droughts. Historic National greenhouse gas (GHG) emissions published by the Environmental

Protection Agency (EPA) were also reviewed and used to inform the climate baseline assessment. National greenhouse gas (GHG) emissions are required to meet EU specific targets however Ireland's annual GHG emissions have been in exceedance of these targets thus far.

### 15.1 PEAT EXTRACTION PHASE (1988 – JUNE 2020)

The Climate Action and Low Carbon Development (Amendment) Act 2021 strengthens Ireland's framework for achieving a climate-resilient, biodiversity-rich and climate-neutral economy by 2050. It provides for carbon budgets and sectoral emissions ceilings, as well as the Climate Action Plan and National Long-Term Climate Action Strategy. The Application Site falls within the LULUCF (Land Use, Land Use Change and Forestry) sector. As the sectoral emissions ceilings were established in 2022, they were not in place during the Peat Extraction Phase (1988–2020). Therefore, the peat extraction and ancillary activities during this period were not subject to these sectoral emissions ceilings.

The carbon dioxide (CO<sub>2</sub>) emissions associated with the peat extraction activities and all ancillary works over the period July 1988 – 2020 were calculated. On average over this 32-year period there was 39,693 tonnes of CO<sub>2</sub> per annum released from the Application Site. Annually this equates to 0.02% of Ireland's 2026 – 2030 carbon budget of 200 MtCO<sub>2</sub>e or 0.026 % of Ireland's more stringent 2031 – 2035 carbon budget of 151 MtCO<sub>2</sub>e. In total, 1,270,192 tCO<sub>2</sub>e was released during the Peat Extraction Phase.

There was also the potential for Greenhouse gas (GHG) emissions from vehicles used by workers travelling to the site. However, the number of vehicles involved and the resulting

emissions were expected to be very small and not significant when compared with Ireland's overall climate targets and limits on emissions.

The removal of the carbon store of the Application Site and the subsequent release of CO<sub>2</sub> from the peat extraction and ancillary activities resulted in a long-term, negative and significant impact to climate.

## 15.2 CURRENT PHASE (JUNE 2020 – PRESENT DAY)

As peat extraction has ceased since June 2020, carbon losses associated with peat removal and the subsequent impact to climate are not relevant to this phase.

However, areas of degraded bog will continue to act as sources of these GHG until they are either rewetted/revegetated, the peat is removed or all the remaining peat has oxidised. In addition to the consideration of the loss of a sink due to the dewatering/removal of vegetation, consideration must be given to the dewatered peat now being a source of CO<sub>2</sub>e. The Current Phase of the Project has the potential to emit approximately 3,033 tCO<sub>2</sub>e each year until the land is rewetted or revegetated or developed into an alternative land use. In the context of Ireland's carbon budgets, this annual emission equates to 0.002 % of Ireland's 2026 – 2030 carbon budget of 200 MtCO<sub>2</sub>e or 0.002 % of Ireland's more stringent 2031 – 2035 carbon budget of 151 MtCO<sub>2</sub>e.

There is the potential for some minor GHG emissions associated with vehicles accessing the Application Site for removal of stockpiled peat or for monitoring works. However, the number of vehicles accessing the Application Site will be minimal and GHG emissions associated with these are not predicted to be significant in relation to Ireland's climate budgets and sectoral emissions ceilings. The effect on climate is considered long-term, negative which is overall not significant.

## 15.3 REMEDIAL PHASE

The primary focus of the rehabilitation plans is re-wetting the bogs which will aid in restoring the carbon store function and promote the carbon sink potential of the land. The CO<sub>2</sub> reductions will increase over time as the carbon store of the land returns. In the first 0 – 5-year period there is the potential for a reduction 28,792 tCO<sub>2</sub>e. This has the potential to increase to a reduction of 575,838 tCO<sub>2</sub>e in years 95 – 100.

The purpose of the Remedial Phase of the Project is in line with a number of key actions and priorities within CAP24 and CAP25 in relation to the rehabilitation of peatlands, specifically those within the mid-lands area. With the restoration of the carbon sink potential of the land, albeit, to a lesser extent than the potential prior to the historic removal of the peat, the project will aid in Ireland's trajectory towards net zero by 2050.

Overall, the impact on climate is considered long-term, positive and not significant.

## 16 INTERACTIONS

Chapters 6 to 15 of the remedial EIAR identify and outline the potential significant environmental effects that may have occurred, and which are likely to occur into the future, in terms of Population and Human Health, Biodiversity, Land, Soils and Geology, Hydrology, Hydrogeology and Water Quality, Air Quality, Noise and Vibration, Landscape and Visual, Cultural Heritage (Archaeological, Architectural and Cultural Heritage), Material Assets (including Traffic and Transport), and Climate as a result of the Project.

Chapter 16 of the remedial EIAR presents the potential for interaction of environmental effects. For any project with the potential for significant environmental effects there is also the potential for interaction to occur between these potential significant effects. The result of interactive effects may exacerbate the magnitude of the effects, or improve them, or have a neutral effect. An interaction matrix is presented as part of this chapter in the remedial EIAR. This identifies potential interactions between the various environment aspects assessed in this Remedial EIAR. The matrix highlights the occurrence of potential interaction (either positive or negative effects) during the Peat Extraction Phase, Current Phase, and Remedial Phase.

