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5. PLANNING POLICY

5.1 INTRODUCTION

This chapter of the remedial Environmental Impact Assessment Report (remedial EIAR) sets out the strategic planning context for regularising the planning status of the peat extraction works (and all ancillary activities) that have been carried out within the Application Site, including detailed consideration of the operational and planning history of five units of the Derrygreenagh Bog Group, namely Toar, Derryarkin, Ballybeg, Drumman and Derryhinch Bogs.

This chapter considers relevant National, Regional, and Local planning policies and objectives relevant to peat extraction and ancillary activities. It sets out the scoping and consultation completed, and the cumulative impact assessment process undertaken as part of this remedial EIAR. This chapter also outlines the historical background of the peat extraction at the Application Site from a strategic perspective, as it was policies associated with this development which not only resulted in the initiation of development of the Application Site for peat extraction, but facilitated the continuance of peat extraction there through the decades up to and beyond the remedial EIAR baseline assessment year of 1988.

The Application Site forms part of the Derrygreenagh Bog Group (which is subject to IPC License Ref. P0501-01) and comprises five bog units located to the south of the M6 motorway, in counties Offaly, Westmeath and Meath.

The Application Site has an area of approximately 2,637 hectares (ha) in total. A full site description is provided in Chapter 1 of this remedial EIAR. Figure 5.1 below illustrates a site location map indicating the extent of lands included within the Application Site.

Given the Application Site lies within the functional area of Offaly, Westmeath and Meath County Councils, this chapter of the remedial EIAR assesses the Project against the current and historic local County Development Plans (CDPs) of the three counties.

As described throughout the remedial EIAR, the Project is defined under three different timeframes termed 'Phases':

- Peat Extraction Phase: peat extraction activities and all ancillary works at the Application Site from July 1988 to the cessation of peat extraction in June 2020.
- Current Phase: the management of the Application Site since June 2020 to present day.
- Remedial Phase: the activities intended to be carried out at the Application Site into the future.

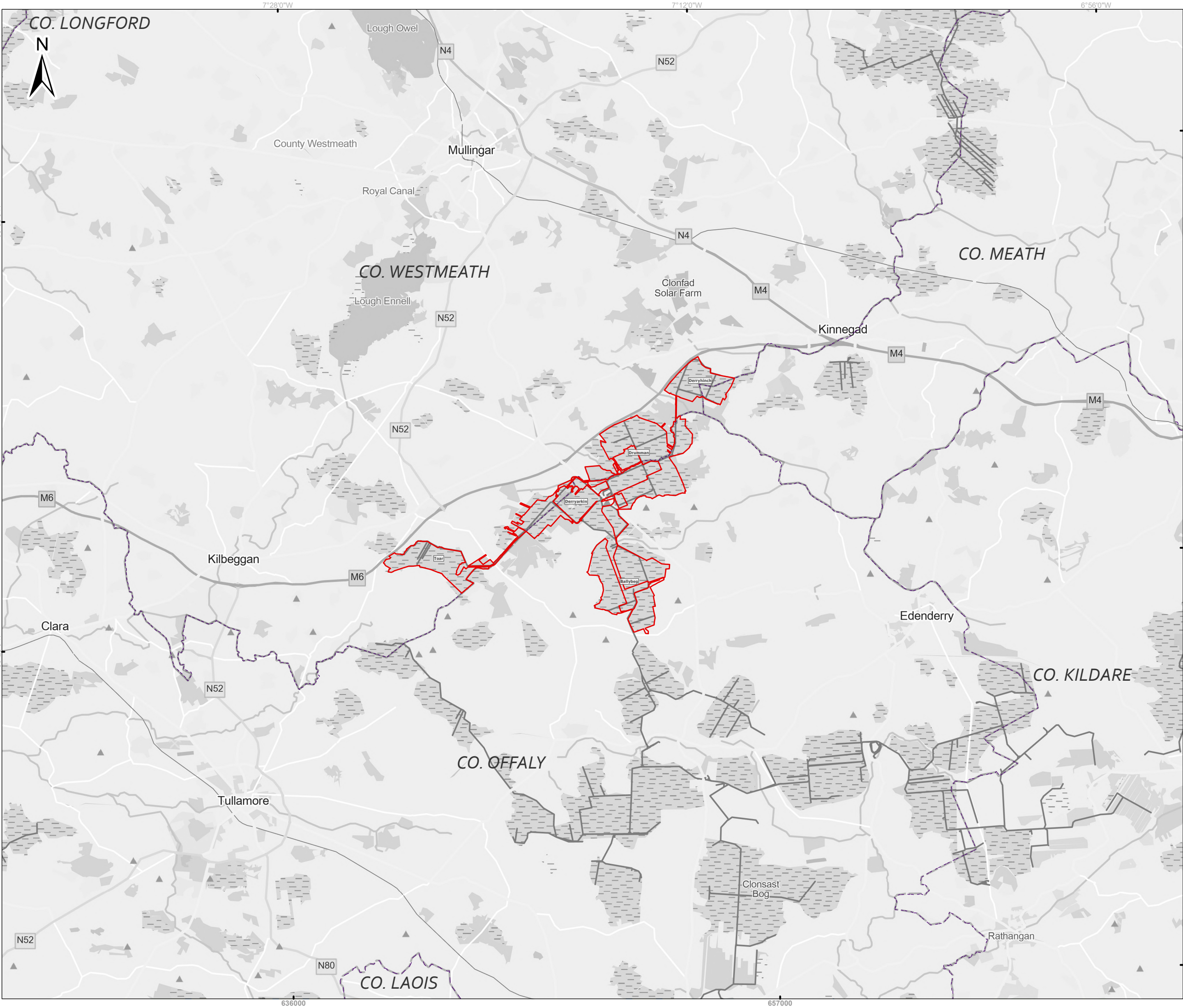
Given the operation of the peat extraction, current management and future remedial phase spans from 1988 to present day and beyond, all of the relevant County Development Plans during this period will be assessed within this Chapter.

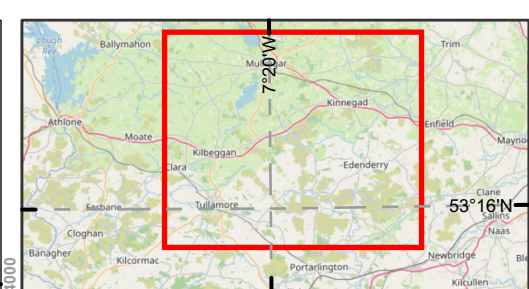
It should be noted that in line with Bord na Móna's vision to assist in achieving a climate neutral Ireland by 2050, it is intended to utilise the Application Site for both peatland rehabilitation and renewable energy infrastructure. BnM have announced their intention to develop a renewable energy development known as the Derrygreenagh Wind and Solar Project ¹at the Application

¹ <https://bnmenergypark.ie/derrygreenagh-wind-and-solar/>



Site. This development will be subject of a separate planning application to An Coimisiún Pleanála. The regularisation, without prejudice, of the planning status of the Application Site via a granting of substitute consent is a critical component to delivering this important future development and crucially ensuring that the lands deliver the maximum climate and environmental benefits possible for the Irish state.





Legend

- Application Site
- County Boundaries

0 2.5 5 Kilometers

Spatial Reference Datum: IRENET95 EPSG: 2157		Copyrights: Map data © OpenStreetMap contributors, Microsoft, Facebook, Google, Esri Community Maps contributors, Map layer		
A	10/09/2026	First issue	S.P	B.K
Rev	Date	Description	By	Chkd.

Client: 

Project: Derrygreenagh Substitute Consent

Title: Figure 5-1: Regional Site Location

Scale @ A3: 1:150,000

Prepared by:	Checked by:	Date:
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Map Ref:	Draft:
12334-021-P.App.BO-OSM-TOB-A	A

5.2 HISTORICAL BACKGROUND OF PEAT EXTRACTION

This section provides a background to the history of the peat industry in Ireland, and the development works which have taken place at the Application Site and wider Derrygreenagh Bog Group since the 1950s.

Peatlands have long played an important cultural and economic role in Ireland, predating the establishment of Bord na Móna in 1946. Evidence shows that peatlands have been exploited as a fuel resource for over a thousand years, with turf established as a major fuel source across Ireland by the 17th century.

By the 18th century, the growth of urban centres, particularly Dublin, led to a significant increase in turf cutting on bogs in close proximity to cities. This expansion was facilitated by the extension of the Grand Canal, which reached Monasterevin, Co. Kildare in 1786 and provided an important transport route through the Bog of Allen. During this period, Government policy prioritised agriculture as Ireland's principal industry. As a result, the development of peat as a fuel resource was discouraged due to concerns regarding potential competition with British coal supplies.

Surveys of peatlands were undertaken by the Bog Commissioners in the early 1800s, culminating in the publication of four reports between 1810 and 1814. These reports focused primarily on the suitability of Irish bogs for agricultural use. Concurrently, the Dublin Society promoted the drainage and reclamation of peatlands from 1731 onwards, an approach that was later supported by the British Parliament through the introduction of numerous bills between 1823 and 1875.

By the late 19th and early 20th centuries, there was a shift in emphasis towards the utilization of peatlands as a fuel source, alongside efforts to improve the quality and efficiency of turf extraction. Prior to the establishment of the state-led peat development bodies including the Turf Development Board Ltd, which later became Bord na Móna, peat extraction was largely undertaken by private enterprises and individual operators.

In 1919, Dáil Éireann established a National Commission of Enquiry into the Resources and Industries of Ireland. Its 1921 report recommended experimentation with peat-fired electricity generation and advocated for State ownership of large peatland areas. Interest in developing peat as a national energy resource continued into the 1930s. During its election campaign, Fianna Fáil made commitments to the development of the bogs, and in 1933 C.S. 'Todd' Andrews was appointed to the Department of Industry and Commerce to implement a national turf development scheme.

This scheme aimed to stimulate private turf extraction, establish minimum quality standards, regulate prices, and organise distribution. With the support of the Irish Agricultural Organisation Society, approximately 180 co-operative turf societies were established. However, difficulties in administering the scheme led Andrews to advocate for a more centralized approach to peat resource management, ultimately resulting in the establishment of the Turf Development Board Ltd., which later became Bord na Móna.



5.2.1 The Turf Development Board Ltd.

The Turf Development Board Ltd. ('TDB') was established in 1934 as a State-owned company financed by the Exchequer, tasked with the development of Ireland's peatlands. The identification of suitable peat extraction sites began in 1935, when the TDB began a systematic survey of Irish bogs nationwide.

These surveys built upon the knowledge presented in the Bog Commissioners' reports, which provided an important baseline for identifying bogs suitable for peat extraction. Between 1935 to 1937, a total of 13 initial surveys were carried out and over the next 17 years some 625 individual surveys were completed, resulting in a comprehensive understanding of Ireland's peatlands and enabling informed decision-making in relation to the selection of sites for peat extraction.

The Turf (Use and Development) Act 1936 (hereafter 'the 1936 Act') was enacted by the Dáil in June 1936. One of the more significant provisions of the 1936 Act was Section 22(1), which gave Ministers the power to acquire land required for the Turf Development Board's operations, including the extraction, preparation for sale, or storage of turf, and any purpose ancillary to such activities, by way of compulsory purchase.

In the same year, the Board acquired Turraun Bog in County Offaly and purchased extensive boglands in Clonsast, County Laois, and Lyrechrumpane, County Kerry. These early strategic acquisitions were subsequently drained and prepared for mechanised peat extraction using German "Baggers". Additionally, a peat briquette factory began operations in Lullymore, Co. Kildare in 1936, supplying priority industries and the railway network with peat generated energy.

5.2.2 The War Years and the Need for Indigenous Fuel

The utilisation of peat as an indigenous fuel resource, facilitated by the 1936 Act, came into prominence during the Second World War as a consequence of depleted coal reserves within the UK. The coal shortage in the UK resulted in a shortage of imported coal into Ireland, upon which energy production was heavily dependent. This situation led to an urgent need to increase fuel independence and enhance Ireland's energy security through the accelerated development of peat resources.

In 1941, Hugo Flinn T.D. was appointed as Turf Controller, with responsibility for overseeing the production of native fuels. Flinn established the Turf Emergency Committee, the findings and recommendations of which informed the Government's implementation of four major initiatives aimed at increasing turf production and distribution, namely:

- Encouraging private turf production (the TDB handled publicity and marketing associated with this endeavour);
- Establishing County Council production schemes, in which County Councils took responsibility for the production of turf, with the assistance of powers bestowed on them by the Government to compulsorily acquire, work and let turf banks;
- Acquiring bogs and other lands in a scheme which became known as the 'Kildare Scheme'. The Kildare Scheme involved the crash development of c. 24,000 acres of



- bog, as well as the building of fourteen residential camps to house workers developing peat resources; and,
- Producing machine turf, briquettes and hand-won turf on TDB bogs.

The implementation of these Government projects during the Second World War ensured that Ireland had continuity of energy supply, at a time when the fuel imports on which the country so heavily relied, dwindled.

5.2.3 Establishment of Bord na Móna and the First Development Programme

Following the Second World War, the Irish State was keen to continue to develop indigenous fuel resources in order to increase national energy security, particularly in light of the fuel shortages experienced during the war years. In this context, the TDB was requested by the Government to devise a programme to develop the country's peatlands.

Consequently, the TDB was transformed into Bord na Móna which was established as a statutory authority under the Turf Development Act 1946 ('the 1946 Act'). Bord na Móna was given responsibility for the 'development of the nation's peat resources'. Section 17(1) of the Act set out the functions of Bord na Móna, as follows:

- (i) *To produce and market turf and turf products;*
- (ii) *To foster the production and use of turf and turf products;*
- (iii) *To acquire bogs and other lands;*
- (iv) *To manage, develop and work bogs and other lands vested in the Board [Bord na Móna]; and*
- (v) *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.*

At this time, the Government issued a White Paper which set out a comprehensive strategy for the mechanized development of the State's peat resources. The objectives of this strategy were to reduce reliance on imported fuels, enhance energy security, and provide significant employment opportunities in rural areas. This White Paper later became known as the First Development Programme.

The principal proposals of the First Development Programme included:

- The development of 24 bogs for peat extraction;
- The improvement of Lullymore Briquette Factory;
- The construction of a peat moss litter factory at Kilberry;
- The establishment of a Government-funded peat research station; and,
- The construction of peat-fired power stations at Portarlinton, Allenwood, and Lanesboro.

The First Development Programme also outlined policies which underpinned the Government's commitment to peat-based energy production. These included policies supporting new electricity generation projects based on turf, all public and state-assisted housing in turf-producing areas were to have appliances suitable for burning turf, and all institutions constructed by local authorities were to have boilers capable of burning turf. Additionally,



factories located in turf-producing areas and benefiting from Government grants were required to install turf-burning equipment.

By 1946, Bord na Móna employed approximately 5,138 workers, and a significant number of bogs were either under development or already in production.

5.2.4 The Second Development Programme

In 1947, the Bord na Móna proposed to Government that the output targets of the First Development Programme be significantly expanded. The proposal was well-received and resulted in the enactment of the Turf Development Act 1950 ('the 1950 Act'), which came into effect on 26 July 1950. The 1950 Act broadened the statutory powers of Bord na Móna and marked the formal commencement of the Second Development Programme.

Under the Second Development Programme, Bord na Móna planned a substantial expansion of peat extraction capacity, with the aim of achieving annual output levels of approximately two million tonnes of machine sod turf. This expansion was accompanied by proposals for the construction of five additional peat-fired power stations, located at Ferbane, Rhode, and Shannonbridge in County Offaly, Bellacorick in Co. Mayo and Unit 2 of Lanesboro Power Station in Co. Longford.

Furthermore, under Section 5(1) of the 1950 Act, the Bord na Móna was granted the authority to build housing for its permanent workforce. Nine housing schemes comprising a total of 582 houses were submitted to the Minister for Industry and Commerce for approval, with site development works commencing in 1951.

During the early 1950s, discussions between the Bord na Móna and the Electricity Supply Board ('ESB') focused on expanding the use of peat for electricity generation. They also considered the potential of milled peat as a boiler fuel for power stations. By 1952, the Bord na Móna commenced supplying peat to the ESB's Allenwood station and identified suitable bogs for further development. In subsequent years, milled peat extraction started in the Boora bogs to supply fuel for the planned power stations at Ferbane and Lanesboro. During this period, briquette manufacturing capacity was also expanded, and horticultural peat extraction developed alongside energy uses.

The Second Development Programme resulted in a significant increase in peat extraction, with 15 bogs entering production between 1955 and 1959. Preparatory works were also undertaken for the construction of a milled peat-fired power station in Bellacorrick, Co. Mayo, and development continued at Shannonbridge. Significant investments were also made in supporting infrastructure, including the construction and upgrading of railways and road networks within bog areas, as well as improvements in the efficiency and safety of peat extraction and transportation.

By the late 1960s, Bord na Móna had expanded into a large-scale, integrated energy and resource organisation, supplying peat to seven ESB power stations. At this time, the company also operated three briquette factories and two horticultural peat factories, with the total area of bogs dedicated to energy, fuel, and horticultural peat extraction significantly increased.



5.2.5 The Third Development Programme

The growing demand for fuel to supply Ireland's peat-fired power generation network, together with the emergence of the global oil crisis of the 1970s, reinforced the strategic importance of indigenous energy resources. During this period, peat gained renewed prominence as a comparatively cost-effective and secure alternative to imported fuels, and Bord na Móna played an important role in supporting Ireland's energy security.

Given the importance of peat, the Government requested further investment by Bord na Móna. This led to the enactment of the Turf Development Act (August 1975), which increased the company's permitted capital borrowings to £60 million and enabled the implementation of the Third Development Programme. This programme involved the acquisition of approximately 30,000 hectares of additional land and investing approximately £164 million. Its objectives included the further expansion of peat-based electricity generation capacity and the construction of additional briquette manufacturing factories.

By 1980, significant progress had been made in drainage and development works on approximately 17,000 hectares of the acquired land. The majority of these works related to the extension of its existing operations and the expansion of horticultural peat extraction.

At its peak during this period, approximately 7,000 workers were employed by Bord na Móna, making it a major social and economic presence in many rural areas. Major civil engineering works were carried out to extend the industrial railway network and associated infrastructure, supporting the expansion of operations and horticultural peat extraction.

Notwithstanding the increased utilisation of peat, the Third Development Programme faced financial challenges. The Programme had been predicated on the sustained high international oil prices, which did not ultimately materialise. Additionally, the emergence of natural gas from Kinsale in 1979 and the Private Turf Development Act of 1981 led to shifts in consumer preferences towards more efficient fuels and encouraged private development of smaller bogs. Consequently, Bord na Móna's market share decreased, leading to the decision to construct only one new briquette factory in Littleton, Co. Tipperary.

5.2.6 After the Third Development Programme

By the late 1980s, Bord na Móna was facing challenges as a high-cost producer within an already costly industry. Falling energy prices exacerbated the situation, along with adverse weather conditions, particularly in the 1985 and 1986 extraction seasons. In 1985, the company's milled peat extract fell 39% short of the target, resulting in a difficult decision to announce the potential redundancy of approximately 2,300 employees by the end of August 1986.

However, favourable weather during the late autumn in 1986 allowed for an unexpected extension of the extraction season, resulting in 45% of the annual production target being achieved during that period. Ultimately, the year's total harvest reached 78% of the annual target, largely due to the determination of the employees. This success prompted the company to proceed with only 350 layoffs, mostly on a voluntary basis, based on improved financial forecasts.

From 1989 to 1993, Bord na Móna implemented a rationalisation programme aimed at reducing production costs and improving productivity across its operations. In the financial year



1988/89, staff costs amounted to £59.1 m out of a total operating cost of £100 m, highlighting the need for organizational restructuring. Significant workforce reductions were undertaken during this period, with approximately 3,500 jobs lost.

A range of cost-control and efficiency measures were introduced, including the implementation of a new operational model based on Autonomous Units, whereby workers were paid based on output and efficiency, resulting in productivity gains. However, around 3,500 jobs were lost during this process. Additionally, the company underwent divisionalisation in April 1989, with separate divisions established to operate autonomously, aligning the company's focus more closely with market conditions and customer demands.

A key outcome arising from this rationalisation process was a renewed commitment to securing the continued role of peat within Ireland's energy mix. In June 1993, a feasibility study was submitted to the Minister for Transport, Energy and Communications in relation to a proposed peat-fired generating station, known as Europeat 1 (later developed as Edenderry Power Plant, located in Edenderry, County Offaly). In April 1995, an agreement was reached with the European Commission regarding the provision of financial support for the 120 MW power plant.

The Ballydermot Bog Group and Derrygreenagh Bog Group were identified as the primary supply bogs for the power plant. Construction of the Edenderry Power Station commenced in January 1999 and was commissioned for operation in December 2000.

5.3 DEVELOPMENT AT THE APPLICATION SITE

This section of the remedial EIAR describes Bord na Móna's historic operational activities at the Application Site. The development of the Application Site for peat extraction was intrinsically linked to the strategic objectives set out in a Government White Paper that later became known as the First Development Programme, as discussed in Section 5.2.3. Peat extraction at the Application Site began in response to the Electricity Supply Board's (ESB) decision to develop the 80 MW Rhode Power Station, located southeast of the site. Around the same time, the Croghan Briquette Factory was established nearby to process milled peat into fuel briquettes.

Rhode Power Station was developed under an agreement whereby Bord na Móna would supply peat exclusively from nearby bogs, including the Application Site. The station was commissioned in two phases, with Station A opening in 1960 and Station B in 1963.

The power station was primarily fuelled by milled peat extracted from the Application Site. In 1967, Bord na Móna also trialled the production of small sod peat ("Fóidín") at Derrygreenagh to supplement milled peat supplies. Following the closure of Rhode Power Station in 2003, peat extracted from the Application Site continued to be supplied to other users, including Edenderry Power Station, whose construction commenced in January 1998 and which was commissioned for operation in 2000.

Croghan Briquette Factory commenced operations in 1961 and processed approximately 1,000 tonnes of milled peat per day, sourced from a number of bogs including the Application Site. The factory closed in 2000 and was demolished in 2021.

5.3.1.1 1950s Development

As discussed in Section 5.2.3, following the Second World War, the Irish State was keen to develop indigenous fuel resources to increase national energy security. The transformation of



the TDB into Bord na Móna and the establishment of the First Development Programme led to the initial drainage and commencement of peat extraction activities at the Application Site from 1950.

The Annual Report from 1950-1951 lists Derrygreenagh Bog as under preliminary development, which confirmed that drainage works commenced at the Application Site from 1950 in preparation for milled peat extraction. Works buildings were completed, a road bridge was constructed over the main railway line, and rail infrastructure development commenced.

5.3.1.2 1960s Onwards

Bord na Móna's Annual Reports from 1960–1969 confirm that Derrygreenagh Bog underwent extensive drainage, development, and infrastructure works throughout the 1960s to facilitate milled peat extraction. These works included land acquisition, surveying, drainage, bridge construction, railway installation, embankments, cuttings, level crossings, and workshop extensions.

By the early 1960s, the Derrygreenagh Bog Group had been established as a major centre for milled peat extraction. During the decade, the site became a significant supplier of peat for electricity generation at Ferbane and Rhode Power Stations and for briquette extraction at Croghan Briquette Factory. Development and extraction activities continued throughout the decade, consolidating Derrygreenagh's role as a key peat extraction area within Bord na Móna's operational estate.

Table 5-1 below summarises the various bogs and operations at each bog unit across the Application Site.

Table 5-1: Operational History of the Application Site (Source: Bord na Móna)

Bog Unit	Commencement of Site Preparation Works (vegetation clearance and drainage insertion)	Extraction Commenced	Extraction Ceased
Derryhinch Bog	1950	1958	2017
Drumman Bog	1950	1958	2018
Derryarkin Bog	1950	1958	Between 1988 and 1991
Toar Bog	1950	1958	2018
Ballybeg Bog	1950	1958	2020

It is estimated that between the commencement of peat extraction at the Application Site in 1958 and July 1988, approximately 21,551,625 tons of milled peat was extracted.

5.3.1.3 Other Land Uses

Following the extraction of peat deposits at Derryarkin and Drumman Bog, the central section of the former cutaway bog was converted to a sand and gravel extraction pit, permitted in 2001



(Offaly Co. Co. Planning Ref. 01/365 and Westmeath Co. Co. Planning Ref. 01/444). The former excavation area has since developed into a lake, accompanied by several smaller, irregular waterbodies across the pit floor. A rehabilitation plan was approved as part of the original permission.

There is also a consented biomass storage facility located at Drumman and Toar Bogs which allows for the storage and seasoning of biomass logs and the chipping and seasoning of logs.

The sand and gravel pits and biomass storage facilities have been excluded from the Application Site boundary.

5.3.1.4 Cessation of Peat Extraction at the Application Site

Industrial peat extraction ceased at the Application Site in June 2020 following the High Court's judgment on Friends of the Irish Environment Ltd v Minister for Communications, Environment and Climate Action & Ors. [2019] IEHC 646, which set aside the Peat Regulations in their entirety. In January 2021, Bord na Móna formally announced that all industrial scale peat extraction on lands within its management would permanently cease in line with its on-going climate action programme and its transition to becoming a climate solutions company, as discussed further in Section 5.7 below.

Following the cessation of peat extraction in June 2020, any remaining stockpiled peat at the Application Site was transported by rail and lorry to Ballivor Horticultural Works, Derrinlough Briquette Factory, Lough Ree Power Station, West Offaly Power Station, Cúil na Móna Horticultural Works, Edenderry Power Station, and other third-party horticultural peat customers.

In summary, development works began at the Application Site in the early 1950s. Industrial scale peat extraction subsequently commenced from 1958 to June 2020 for the extraction of milled peat for fuel purposes.

5.4 SITE PLANNING HISTORY

There have been numerous planning applications within the Application Site since the requirement for planning permission was introduced by the Planning and Development Act 1963.

Table 5-2 provides a list of relevant planning applications across the five bogs.

Table 5-2: Application Site Planning History

Consenting Authority	Planning Reference	Description of Development	Final Grant Date	Address
ACP	319023	Combined Cycle Gas Turbine and Open Cycle Gas Turbine Thermal Power Plant, Electricity Grid Connection including 2 no. substations, and associated buildings, plant, site works, service and ancillary development (known as Derrygreenagh Power Plant)	28/04/2026	Lands within the townlands Knockdrin, Derrygreenagh, Derryarkin, Derryiron, Ballybeg, Coolcor, Barrysbrook, Clonin, Togher and Coole, Co. Offaly
ACP	307278	Application for substitute consent in relation to Peat Extraction at Bogs in the Derrygreenagh Bog Group	Application Withdrawn on 14/01/2021	Bracklin, Co. Westmeath, Carranstown, Co. Meath and Co. Westmeath, Ballivor, Co. Meath and Co. Westmeath, Ballybeg, Co. Offaly
ACP	309112	Retention and continuation of development. Works for an existing biomass facility on a site of 14.34 ha. This site will be operational until 2030.	11/05/2021	Toar, Rathgarrett, Tyrellspass, County Westmeath
Offaly County Council	20/329	Drumman biomass facility. The development is for the storage and seasoning of biomass logs followed by chipping of the seasoned logs on a site area of 29.17ha. The proposed retention development consists of 1) a weighbridge (120 sq.M) and a	10/06/2021	Drumman biomass facility, located within the townlands of Derrygreenagh & Knockdrin, Co. Offaly



Consenting Authority	Planning Reference	Description of Development	Final Grant Date	Address
		weighbridge control station (7.75 sq.M). 2) a biomass storage area (6km of linear log storage space equating to 31,320 tonnes of wet logs), 3) a steel post and wire mesh fence with gates at the entrance 4) unpaved access tracks (6km in length) and 5) all ancillary works. The log storage area or log pile is linear with a diameter of c. 4m and up to a height of 4.1m. There is no storage of chipped biomass on site. Planning permission is sought for alterations to improve the existing access off the R400 including 1) surface the site access road approach to the R400 with an appropriate bound material and 2) provide a stop line and stop sign at the site entrance. Planning permission is sought for the continued operation of this development until 2030		
ACP	306236	Leave to apply for substitute consent for peat extraction	01/05/2020	Derrygreenagh Bog, Bracklin, Co. Westmeath, Carranstown, Co. Meath and Co. Westmeath, Ballivor, Co. Meath and Co. Westmeath, Ballybeg, Co. Offaly



Consenting Authority	Planning Reference	Description of Development	Final Grant Date	Address
Offaly County Council	18209	Derryarkin Sand and Gravel DAC for the construction of a weighbridge (90m ²) and 2 no. control rooms subject to 5 conditions.	09/08/2018	Derryarkin sand pit, Derrygreenagh, Rhode, Co. Offaly
Offaly County Council	15330	An existing 30m high telecommunications support structure.	02/03/2016	Derrygreenagh, Rhode, Co. Offaly
Offaly County Council	10391	Temporary planning permission (duration 10 years) – application running concurrently with Westmeath County Council planning application 10/4078. Planning permission is sought for permission to upgrade the existing site access, construction of a moto-cross circuit and ancillary infrastructure.	21/04/2011	Derrygreenagh, Rochfortbridge, Co. Offaly
Westmeath County Council	104078	Temporary planning permission (duration 10 years) for construction of moto cross circuit and associated infrastructure.	02/08/2011	Derryarkin, Rochfortbridge, Co. Westmeath
Offaly County Council	051113	Installation of a fixed processing plant for the extraction of blacktop on a	26/04/2006	Derrygreenagh, Rhode Co. Westmeath

Consenting Authority	Planning Reference	Description of Development	Final Grant Date	Address
		site of 0.875 ha at existing sand and gravel quarry.		
Offaly County Council	04988	Retention of telecommunications mast	23/09/2004	Derrygreenagh, Co. Westmeath
Offaly County Council	02/172	Construction of an entrance to a sand and gravel extraction facility.	10/06/2002	Derrygreenagh, Co. Offaly
Offaly County Council	011163	Concrete batching plant, block yard, block storage area, site office building, effluent treatment system, ESB substation & bunded fuel storage tanks	16/10/2002	Derrygreenagh, Rhode
Westmeath County Council	01444	Extraction of sands and gravels.	23/01/2002	Derryarkin and Drumman, Co. Offaly and Westmeath
Offaly County Council	1925	An 87.6-hectare extension to the south-west, south and south-east of its existing sand and gravel put (within an application site of 146.1 hectares)	29/04/2019	Derrygreenagh, Knockdrin, Garr and Carrick townlands, Rhode, Co. Offaly
Westmeath County Council	124018	Permission for site access works to allow for the out loading of peat. These works consist of; access works at junction with L-1113	11/06/2012	Rathgarrett, Tyrrellspass, Co. Westmeath



Consenting Authority	Planning Reference	Description of Development	Final Grant Date	Address
		Tyrrellspass to Rathgarrett Road and construction of a new access road to facilitate peat out loading.		

It is important to emphasise that these developments have been constructed and operated in line with their specific conditions of permission and at the time of writing are considered compliant within the planning system. As such, it is not intended that these developments are subject to a requirement for substitute consent. However, they are considered as part of the remedial EIAR and remedial Natura Impact Statement (remedial NIS) where necessary.

Any development undertaken prior to the establishment of the formal Irish planning system under the Local Government (Planning and Development) Act 1963 is considered exempt from planning control. Accordingly, such developments do not require planning permission under the 1963 Act, and no formal planning applications were required or submitted in respect of these works.

5.4.1 Planning Legislation

Industrial-scale peat extraction was on-going within the Application Site prior to 1988, before the required transposition of the EIA Directive and Habitats Directive, with peat extraction commencing from 1958 at the Application Site.

Peat extraction activities, which were within the definition of ‘agriculture’ with regard to turbary, were classified as exempted development under Section 4(1)(a) of the Local Government (Planning and Development) Act 1963. This exemption was broadly continued under Section 4(1)(a) of the Planning and Development Act, 2000 (‘the Act’), which provides:

“4.- (1) The following shall be exempted developments for the purposes of this Act –

(a) Development consisting of the use of any land for the purpose of agriculture and development consisting of the use for that purpose of any building occupied together with land so used”

The 1963 Act included the use of land for turbary within the definition of “agriculture”. However, the Planning and Development Act 2000 does not explicitly include turbary within its definition of agricultural use.

Notwithstanding this change, the Planning and Development Regulations 2001 (as amended) (“the Regulations”) include exemptions in respect of peat extraction activities. In particular, Class 17, Part 3 (Schedule 2) of the Regulations provides that the following forms of peat extraction constitute exempted development:

- a. Peat extraction in a new or extended area of less than 10 hectares, or
- b. Peat extraction in a new or extended area of 10 hectares or more, where the drainage of the bogland commenced prior to the coming into force of these Regulations.

The provisions of Class 17 (b) therefore remained relevant to the peat extraction works and all associated activities undertaken at the Application Site due to the historic nature of the drainage activities on site.

The enactment of the Environment (Miscellaneous Provisions) Act 2011, which came into effect on the 20 September 2012, inserted Section 4(4) into the Act, provides:

“Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an



environmental impact assessment or an appropriate assessment of the development is required."

Prior to the enactment of the Environment (Miscellaneous Provisions) Act 2011, Westmeath County Council referred a Section 5 Declaration of Exemption (S5-24-11) to the Board on the 2 February 2012. The referral sought a determination as to whether the drainage of boglands, peat extraction, access from public roads and peat handling activities at lands at Lower Coole, Mayne, County Westmeath constituted development and, if so, whether such development was exempted (An Bord Pleanála Ref. RL2975).

The Board concluded that the on-going development (i.e. the continuation of works to extract peat) at the subject site remained exempted development under the Act, notwithstanding the omission of any reference to turbary in Section 2 of the Planning and Development Act 2000. This conclusion was reached by virtue of Article 11 of the Planning and Development Regulations 2001 and was expressed as applying regardless of whether an EIA or AA is required.

However, the Board then proceeded to consider whether the continued extraction of peat (where such extraction had not been completed by 21 September 2012) and which formed part of the Section 5 referral, would require EIA and/or AA in light of Section 4(4) of the Act, which had been inserted during the Board's consideration of Ref: RL2975.

The Board ultimately concluded that:

"because the development involved in continued works to extract peat from the site requires an Environmental Impact Assessment and Appropriate Assessment then, notwithstanding Article 11 of the Planning and Development Regulations 2001, any such works on or after the 20th day of September 2012 is not exempted development by virtue of section 4(4) of the Planning and Development Act, 2000, as inserted by section 17 of the Environment (Miscellaneous Provisions) Act 2011"

The Board's decision on planning application RL.2975 broadly established the precedent that the drainage of boglands and extraction of peat constitute development and that such development is not exempted development with regard to Section 4(4) of the Act.

Westland Horticulture Limited and Bulrush Horticulture Limited were subsequently granted leave to seek judicial review to apply for an order of certiorari for quashing the Board's decision on RL.2975 on the basis, inter alia, that the extraction of peat was a 'use', rather than 'works'. It was argued that the development required to facilitate that use would have been completed not later than 12 months after its commencements, and that peat extraction, as a use, should therefore continue to benefit from exempted development status (*Westland Horticulture Limited and Bulrush Horticulture Limited v An Bord Pleanála* (2013/398/JR – [2018] IEHC 58).

This argument was rejected by Mr. Justice Meenan in his judgment of February 2018, in which he held that peat extraction was both works and use and, as peat extraction involving a new or extended area of 30 hectares or more required EIA (Schedule 5, Part 2, Class 2a of the Regulations), planning permission was required. This decision was subject to an application for leave to appeal, which was refused on 7th December 2018, and consequently, the Board's decision on RL.2975 was upheld by the High Court.

Accordingly, as established by RL.2975 and the subsequent High Court judgment in [2018] IEHC 58, the requirement for EIA and/or AA operates to remove the benefit of exempted



development for peat extraction exceeding 30 hectares, by virtue of Section 4(4) of the Planning and Development Act 2000. In such circumstances, planning permission is required.

Following the High Court judgment in [2018] IEHC 58, the ‘Peat Regulations’ were enacted in January 2019, which consisted of two pieces of legislation that provided for an exemption from planning permission for large scale peat extraction activities (i.e. 30ha or greater), together with the introduction of a regulatory framework (to include both EIA and AA) for these developments to be operated by the EPA through its activity licensing regime.

The Peat Regulations were subsequently challenged by Friends of the Irish Environment Ltd. and ultimately quashed by Mr Justice Simons by way of his judgment on 20 September 2019, and the associated Order of 18 October 2019. The Court found that the Regulations were invalid on the basis that they were inconsistent with the requirements of Directive 2011/92/EU of the European Parliament and of the Council of the 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (amended by Directive 2014/52/EU of 16 April 2014) (the EIA Directive) and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). The Court further held that the use of secondary legislation to give effect to the new licensing regime under the EPA was ultra vires.

With regard to Class 17 and the introduction of Section 4(4) of the Planning and Development Act 2000, as discussed above, it is important to highlight the observation of Justice Simons within his consideration of [2019] IEHC 646, which stated:

“One of the curious features of the approach initially taken to peat extraction under domestic legislation is that a distinction had been drawn between existing peat extraction, and peat extraction involving “new or extended” areas. Although not stated in express terms, the assumption underlying the legislation seems to have been that existing peat extraction did not have to comply with the EIA Directive. In order to benefit from this special treatment under domestic law, all that was necessary was that the drainage of the bogland had commenced prior to the coming into force of the relevant parts of the Planning and Development Regulations 2001 on 21 January 2002. Thus, it was not necessary even that the peat extraction had commenced prior to the implementation date for the EIA Directive on 27 June 1988.”

The observation of Mr Justice Simons on the interpretation of previous planning law for peat extraction activities is insightful in reflecting the ambiguity of the regulating framework for this type of activity pre- 2012-2013.

In December 2022, Bord na Móna submitted an application to An Bord Pleanála (now An Coimisiún Pleanála) seeking leave to apply for Substitute Consent under section 177E of the Planning and Development Act 2000 (as amended), under reference LS19.315436, in respect of peat extraction and associated activities at Derryhinch, Drumman, Derryarkin and Ballybeg Bog.

The Planning and Development, Maritime and Valuation (Amendment) Act 2022 subsequently amended the Substitute Consent regime by removing the requirement for a separate “leave to apply” stage. Those provisions were commenced by S.I. No. 645 of 2023 with effect from 16 December 2023.

As the Leave to Apply application (reference. LS19.315436) had not been determined prior to that commencement date, the application was deemed withdrawn on 15 January 2024.

5.4.2 Integrated Pollution Control Licence (IPC) Licence (Ref. P0501-01)

Bord na Móna is currently the only operator in Ireland licensed by the Environmental Protection Agency (EPA), to extract peat over areas greater than 50 hectares. Bord na Móna Energy Ltd was granted its Integrated Pollution Control Licence (IPC) Licence (Ref. P0501-01) from the EPA for the Derrygreenagh Bog Group, within which the Application Site is located, on 26 April 2000.

The EPA issues licences that contain strict conditions on how an activity must operate so as to protect the environment from pollution that might otherwise arise. The EPA Act, 1992 specifically prohibits the EPA from granting a licence if emissions from the activity would cause pollution.

IPC Licence conditions prescribed by the EPA are intended for protection, and where possible, the improvement of the environment and apply from the time of grant of the licence. The EPA has undertaken technical amendments of the IPC Licence in 2012, 2013 and 2014 for the purpose of aligning the operational conditions of the IPC Licence to the objectives of National and European environmental protection legislation enacted over the lifetime of the licence.

The current IPC Licence contains 14 no. conditions relating to operation and monitoring, emissions to water and air, water protection, waste management and bog rehabilitation. The IPC Licence is managed by the Bord na Móna's Environmental Management Department, with day-to-day compliance managed locally.

Condition 2 of the IPC Licence requires an Environmental Management System (EMS), which is reviewed annually and reported to the EPA through an Annual Environmental Report (AER). These reports are publicly available, and the EPA's online portal allows public access to compliance records and the submission of observations or complaints.

The EPA actively monitors compliance through audits and inspections. A site inspection carried out in May 2024 found no non compliances, confirming that operations at the Application Site were being conducted in accordance with the IPC Licence.

5.4.3 Recent Updates to Substitute Consent Legislation

Bord na Móna's previously submitted leave to apply application (ACP Ref. LS25M.306236). An Coimisiún Pleanála granted leave to apply for substitute consent on the 1 May 2020. In allowing Bord na Móna to apply for substitute consent, An Coimisiún Pleanála was satisfied that, in light of the size and scale of the peat extraction carried out subsequent to 20 September 2012 within the Derrygreenagh Bog Group and the proximity of the peatland sites to a number of European sites, an EIA and an AA were required in respect of the development concerned and exceptional circumstances exist to warrant an opportunity to regularise (without prejudice) the development. This decision of An Coimisiún Pleanála was subsequently quashed on 7 May 2021 as a result of the "Ballysax/McQuaid" ruling of the Supreme Court on 1 July 2020. The purpose of this current Substitute Consent application is to regularise, without prejudice, the planning status of the peat extraction and all associated activities completed within the Application Site.

In the period between the granting of leave to apply for substitute consent by An Coimisiún Pleanála in 2020 and the quashing of that decision in May 2021, the Applicant lodged an application for substitute consent for the relevant peat extraction works at Derrygreenagh Bog Group (Ref. SU25M.307278) on 2 June 2020. Some lands within the Application Site were subject of that substitute consent application. Subsequent to the aforementioned “Ballysax/McQuaid” ruling the Applicant formally announced in January 2021 that all industrial scale peat extraction on lands within its management would permanently cease and the application for substitute consent was withdrawn by on 14 January 2021.

On 23 February 2022, Bord na Móna plc applied to the Commission for leave to apply for substitute consent at Derryhinch, Drumman, Derryarkin and Ballybeg Bogs in counties Offaly, Westmeath and Meath (ACP Ref. LS19.315436). Given the enactment of the new legislation (S.I. 645 of 2023 - Planning And Development, Maritime And Valuation (Amendment) Act 2022 (Commencement Of Certain Provisions) (No. 2) Order 2023, which removed the requirement to seek leave to apply for substitute consent from the Commission, this application for leave to apply for Substitute Consent was deemed withdrawn on the 15th January 2024 in accordance with Section 41 of the Planning and Development, Maritime and Valuation (Amendment) Act 2022.

While this current application is different to Ref. LS25M.306236 (and Ref. SU25M.307278) with regard to the lands comprising the Application Site for substitute consent and the background context of this request (having regard to the Applicant’s commitment to the permanent and complete cessation of industrial peat extraction), the underlying circumstances of exceptionality have not changed since the Board granted leave to the Applicant to pursue substitute consent for these peat extraction works in May 2020.

5.5 PLANNING POLICY CONTEXT

This section of the chapter outlines the planning policy relevant to the subject works, including the historic planning policy (where available) that was in place at the time that the subject works were carried out, along with current policy where relevant. In some cases, it has not been possible to identify the relevant policies that were in place at the time relating to the subject works due to the historic nature of those policies. Where feasible, some historic policy documents have been sourced from various libraries and archives and are set out in this Section.

This section of the report also sets out the regulatory framework and policy support for historical peat extraction at the Application Site.

The policy assessment assesses the Project in relation to the three phases of the Project (peat extraction phase, current phase and remedial phase).

An assessment of Bord na Móna’s internal operational policies has been provided for context of the company.

5.5.1 Bord na Móna 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, the company has radically changed its approach to face an even greater challenge: climate change. BnM have ended peat extraction and now focus on developing climate solutions in renewable energy, 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.

5.5.1.1 Brown to Green Strategy 2018

Bord na Móna announced its 'Brown-to-Green' Strategy in October 2018, setting out a transformation pathway from peat extraction to the delivery of climate solutions. The Strategy is underpinned by three key objectives:

- To consolidate and simplify Bord na Móna's business structures in order to decarbonise and reposition the company as a renewable energy, resource recovery and low carbon sustainable business;
- To accelerate plans and the development of Bord na Móna's renewable energy and resource recovery businesses; and
- To develop new sustainable businesses to support significant employment.

The implementation of the 'Brown-to-Green' Strategy between 2018 – 2020 resulted in both significant changes and progress in re-focusing and strengthening Bord na Móna's operations to renewable energy generation, recycling and the development of other low carbon enterprises. It ultimately resulted in cessation of industrial peat extraction on all land owned by Bord na Móna.

Bord na Móna's formal announcement in January 2021 that all industrial scale peat extraction on lands within its management would permanently cease represented a significant milestone in the implementation of the 'Brown-to-Green' strategy, as indicated within the announcement details,

"The Brown to Green strategy has involved the transformation of Bord na Móna from a traditional peat business into a climate solutions company... As we have put our new climate-focused business in place, we have also completely stopped a number of high carbon operations and transitioned others to a more sustainable model... Today marks the formal end to the company's association with peat harvesting, as we move on to tackle the critical challenges concerning climate change, energy supply, biodiversity and the circular economy." - Chief Executive Tom Donnellan

Bord na Móna continues to progress its 'Brown-to-Green' Strategy on the basis of four core strategic actions:

- Providing Ireland with sustainable energy from renewable sources at scale;
- Effectively rehabilitating peatlands;
- Delivering world-class waste and resource recovery solutions; and,
- Supporting Ireland in reimagining how it engages with climate action.

5.5.1.2 Bord na Móna's Sustainability 2030 Strategy and Biodiversity Action Plan 2016-2021

Bord na Móna launched its first Biodiversity Action Plan in 2010 with the aim to set out a strategic plan on how it intended to build on the wealth of peatland management, rehabilitation, restoration and conservation that it has built up since its establishment in the 1940s.

The Bord na Móna Biodiversity Action Plan 2016-2021 built upon the foundation of the objectives and the actions of the earlier 2010-2015 plan, updating them to reflect the contemporary understanding and the best practice in peatland biodiversity management and restoration. The revised plan also aligned Bord na Móna's biodiversity objectives with the company's broader strategic direction as set out in the Sustainability 2030 Strategy, launched in October 2015.

The key objectives of the Biodiversity Action Plan are to:

- Understand the current baseline ecological condition of Bord na Móna bog areas and the biodiversity present;
- Develop methods to rehabilitate and restore peatland areas in the post-extraction use phase;
- Engage with the full range of stakeholders in relation to the management of biodiversity on Bord na Móna bogs and promoting awareness of the importance of biodiversity; and
- Provide a mechanism whereby the delivery and progress of the objective outlined within the Biodiversity Action Plan could be reviewed and assessed annually.

5.5.2 National Policy Context

5.5.2.1 Climate Policy

The use of peat as a power source in Ireland is coming to a close, however for a long period of time it was the main means by which power was generated en masse. The National Climate Change Strategy (2000) states the following with respect to the use of peat as a source of electricity:

“To the extent that peat continues to be used for power generation, its use will become more efficient with the commissioning of the new Clonbullogue plant in 2001, and the construction of two further new plants which will progressively replace all remaining, low efficiency, peat generation. These new plants will use the minimum amount of peat compatible with economic operation within the Public Service Obligation (PSO), and their construction, operation and management will be benchmarked on best industry practice to maximise the efficient use of peat”(p. 33)

Under the National Climate Strategy (2007), government policy was supportive of *“co-firing of biomass with peat in power generation as a means of reducing greenhouse gas emissions and introducing additional diversity into the fuel mix for power generation.”*

The above extracts from the National Climate Strategies demonstrate the historic favourable outlook towards the use of peat for power generation in Ireland. Peat was viewed as a key component for diversifying the fuel mix for power generation whilst supporting rural economies where this peat was being extracted.

5.5.2.1.1 Climate Action and Low Carbon Development (2021-2025)

Climate policy has since changed to reflect the latest research findings on climate change and biodiversity loss. Climate policy today focuses on renewable energy, rehabilitation and restoration and the just transition.

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 prepared on a rolling annual basis, with subsequent plans updating and refining earlier actions. The Climate Action Plan 2025 (CAP25), published on 15 April 2025, is the fourth annual update to Ireland’s Climate Action Plan and builds upon CAP24 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. It should be read in conjunction with CAP24 and reaffirms the need for accelerated climate action, noting that rapid and significant reductions in greenhouse gas emissions are required to meet Ireland’s national and international targets.

CAP24 builds upon CAP23 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for achieving Ireland’s legally binding commitment to reduce greenhouse gas emissions by 51% by 2030 (relative to 2018 levels) and to achieve climate neutrality by no later than 2050, in accordance with the Climate Action and Low Carbon Development (Amendment) Act 2021.



CAP24 sets out how Ireland can accelerate the delivery of climate actions, placing climate solutions at the centre of social and economic development, while ensuring a just transition for communities affected by the transition away from high-carbon activities, including peat extraction.

Within CAP24, priorities 1, 2 and 3 are of particular relevance to former peat-producing regions. These priorities seek to:

- Support employment and re-skilling opportunities for former peat communities;
- Enable the rehabilitation and restoration of degraded peatlands; and
- Provide smart and sustainable mobility solutions for these communities.

CAP 24 also identifies the EU's Recovery and Resilience Facility, which is a scheme aimed at rehabilitating peatland. CAP24 recognises that, once rehabilitated, peatlands will support peat forming habitats and a mosaic of wetlands, heathlands, and grasslands, native woodlands, while storing significant quantities of carbon, enhancing biodiversity, and contributing to Ireland's carbon neutrality objectives.

CAP24 Action number JM/24/4 commits the Government to support the restoration and rehabilitation of degraded peatlands, reflecting the central role of peatland recovery in achieving emissions reductions, biodiversity enhancement and a just transition for affected regions.

In Ireland's most recent climate policy document, the 2025 Climate Action Plan (CAP 25), the transition away from peat and oil-fired electricity generation is notable in the 32.1% reduction in greenhouse gas emissions from the electricity sector between 1990 and 2023. The considerable impact of 'the cessation of commercial peat extraction as a feedstock for power generation' is clearly recognised by CAP 25, with Chapter 7 titled '*Delivering a Just Transition in the Midlands Region*'. CAP 25 supports the continued rollout of the National Just Transition Fund which aims to '*support projects that contribute to the just transition to a low carbon, climate resilient economy of the wider Midlands region after the closure of peat-fired power stations.*'

By the end of 2024, it was estimated that up to €15 million had been dispersed across 56 projects. CAP 25 sets out a number of priorities under Chapter 7 relevant to the Application Site, which are detailed below.

7.3.1 Priority 1: *Generating employment for former peat communities by investing in the diversification of the local economy*

7.3.2 Priority 2: *Supporting the rehabilitation and restoration of degraded peatlands and regeneration and repurposing of industrial heritage assets*

5.5.2.2 Carbon Budgets

The first national carbon budget programme, proposed by the Climate Change Advisory Council (CCAC) and approved by Government, was adopted by both Houses of the Oireachtas in April 2022 and comprises three successive five-year carbon budgets.

At the time of adopting economy-wide Sectoral Emissions Ceilings, emerging scientific evidence in relation to the Land Use, Land-Use Change and Forestry (LULUCF) sector resulted in the



deferral of a sectoral emissions ceiling for this sector. As such, no ceiling has yet been established pending completion of further assessment, including the National Land Use Review.

This position reflects ongoing uncertainty in emissions accounting methodologies and projections. Updated Environmental Protection Agency (EPA) estimates revised projected 2030 LULUCF emissions from 7 MtCO₂eq to 11 MtCO₂eq, highlighting the evolving evidence base. The sector is characterised by complex interactions between emission sources and carbon sinks, with continued updates to national inventories and projections.

The development of a LULUCF sectoral ceiling is to be informed by the Land-Use Review and associated Land Use Strategy, which will establish the policy framework and measures necessary to support emissions reductions in this sector.

In the interim, the Climate Act provides for the revision of carbon budgets where significant scientific developments arise, enabling the future integration of LULUCF. Notwithstanding the absence of a defined ceiling, measures such as peatland rehabilitation, afforestation, and related regulatory reforms are being advanced.

5.5.2.3 The National Planning Framework: Project Ireland 2040 (adopted 2018, as Revised 2025)

The National Planning Framework (NPF), published in 2018, forms part of Project Ireland 2040 alongside the National Development Plan (NDP). It provides the Government's long-term spatial planning strategy to guide development and investment across Ireland to 2040 through a series of National Strategic Outcomes (NSOs), National Policy Objectives (NPOs) and strategic planning principles.

The NPF was subject to its first statutory review and was revised in 2024, with the updated framework approved by Government in April 2025. The revised NPF places increased emphasis on the transition to a low carbon and climate neutral economy, including the need to accelerate renewable energy generation, strengthen electricity grid infrastructure and support the deployment of new and emerging technologies such as wind, solar, smart grids and energy storage.

The revised NPF also recognises the important role of peatlands in climate mitigation as significant carbon stores, while also acknowledging that certain cutaway peat extraction areas may facilitate renewable energy development. The revised framework supports a managed Just Transition of these areas, including their potential for renewable energy generation and wider environmental rehabilitation, in parallel with the protection and restoration of peatland ecosystems.

The revised NPF states that:

- “Peatlands play an important role in helping with climate change mitigation, through carbon sequestration and acting as carbon sinks”;²

² Department of Housing, Local Government and Heritage (2025), National Planning Framework – First Revision, April 2025, Section 9.2, p. 124.

- “A careful balance will be required between realising the potential for renewable energy development... and the protection and restoration of nature and cultural heritage in peatlands”;³
- “A medium to longer-term strategic national land use plan for peatlands in State ownership will be prepared in order to manage their most appropriate future use”;⁴
- “Supporting the Just Transition means that local communities... can participate in the transformations underway across society, including in the energy sector.”⁵

The revised NPF also supports the use of peatland areas for renewable energy development and diversification, including greenways, blueways and peatways, in support of rural economic transition and sustainable development.

The original NPF similarly recognised the importance of climate action and the transition to a low-carbon economy. It identified the need to:

- Transition from predominantly fossil fuels to predominantly renewable energy sources;
- Increase energy efficiency and upgrades to appliances, buildings, and systems;
- support the deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy; and
- Establish appropriate regulatory frameworks to meet demands and challenges in transitioning to a low carbon economy.

The original NPF acknowledged that rural areas have historically contributed significantly to Ireland’s energy needs and will continue to do so, recognising their important role in securing a sustainable renewable energy supply. The Framework noted that, in meeting the challenge of transitioning to a low carbon economy, future renewable energy generation would, for the most part, need to be accommodated on large tracts of land in rural settings, subject to the protection of environmental assets and consideration of the needs of rural communities.

In this regard, the NPF explicitly highlighted publicly owned peat extraction areas as having particular potential for renewable energy deployment and associated economic transition, stating that future renewable energy planning would focus “on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy”.

A number of National Policy Objectives (NPOs) within the NPF were directly relevant to climate action, energy transition and peatland related development, including:

National Policy Objective 30, which aimed to facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of

³ Department of Housing, Local Government and Heritage (2025), National Planning Framework – First Revision, April 2025, Chapter 9, p. 134.

⁴ Department of Housing, Local Government and Heritage (2025), National Planning Framework – First Revision, April 2025, Chapter 9, p. 134.

⁵ Department of Housing, Local Government and Heritage (2025), National Planning Framework – First Revision, April 2025, Chapter 9, p. 134.



maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism.

National Policy Objective 34, which sought to continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises:

- A coordinated approach to the sustainable management of outdoor recreation sites;
- Projects on the basis of their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments.

National Policy Objective 66, which sought for the planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.

National Policy Objectives 69, which aimed to reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.

National Policy Objective 70, which stated to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

National Policy Objective 71, which aimed to support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

National Policy Objective 73, which sought to support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.

Overall, the NPF supports renewable energy development, peatland rehabilitation, rural economic transition and climate action objectives that are directly relevant to the future use and management of former peat extraction areas such as the Application Site.

5.5.2.4 National Development Plan 2021 – 2027

The NDP 2021 – 2027 is aligned with the delivery of the objectives of the NPF. The revised NDP sets out a programme of public capital investment of approximately €165 billion, intended to support the implementation of Project Ireland 2040 and the achievement of its strategic outcomes.

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 proposed rehabilitation measures is set out in the draft Rehabilitation Plans included in Appendix 4-3.

In addition, detail on the allocation of funding, priority investment areas and implementation mechanisms is provided in the Department of Climate, Energy and the Environment's Sectoral Capital Plan 2026-2030 under the National Development Plan. This includes specific commitments relating to electricity grid investment, renewable energy targets, residential energy efficiency programmes and circular economy measures.

5.5.2.5 National Energy and Climate Plan (2021-2030)

The National Energy and Climate Plan (NECP) 2021-2030 aims to diversify and decarbonise Ireland's electricity generation sector, with the long-term objective of decarbonising the energy sector and achieving an economic transformation with a carbon neutral agriculture and land use sector by 2050.

The NECP reiterates the plan to move away from peat-fired power generation and the implementation of the Just Transition Plan for the midland's region particularly in response to the closure of two ESB power stations and the decision to cease all peat extraction a number of years earlier than had been planned. Bord na Móna's Edenderry Power Station ceased burning peat at the end of 2023 but continues to operate, firing biomass to produce electricity.

5.5.2.6 Ireland's integrated National Energy and Climate Plan 2021-2030

Ireland's 'Integrated National Energy and Climate Plan (NECP) 2021-2030' is a comprehensive, EU-mandated framework outlining how the country will meet its energy and climate targets over the decade to 2030, while contributing to longer-term decarbonisation goals up to 2050. It consolidates policies from key national strategies, such as the Climate Action Plan and Project Ireland 2040—into a single, coordinated roadmap.

The NECP is structured around five core dimensions of the EU Energy Union: 'decarbonisation, energy efficiency, energy security, the internal energy market, and research and innovation'. Decarbonisation is central, with measures aimed at reducing greenhouse gas emissions across sectors including transport, agriculture, energy, and buildings. Targets include substantial emissions reductions by 2030 and a transition toward a carbon-neutral economy by 2050.

Key actions include scaling up renewable energy, particularly wind and solar, improving building efficiency through retrofitting and heat pump installation, and promoting electrification of transport. The plan also emphasises increasing indigenous energy extraction to enhance energy security and reduce reliance on fossil fuel imports.

In addition, the NECP supports the integration of Ireland's energy system into the wider EU internal market and prioritises investment in research, innovation, and green technologies to boost competitiveness.

Overall, the NECP acts both as a policy coordination tool and an analytical framework, assessing Ireland's progress toward EU targets and identifying gaps where further measures are required. While progress has been made, the plan acknowledges that additional action is necessary to stay on track to meet 2030 climate goals.

5.5.2.7 Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' sets out a framework to guide Ireland's energy policy development. This White Paper sets out to guide policy and actions that the Irish Government intends to take within the energy sector up to 2030 and also reaching as far as 2050. The framework was developed in the context of the significant role played by European institutions in determining energy policy, markets and regulation. Similarly, it takes account of European and international climate change objectives.

The overall vision within the White Paper means that by 2050, greenhouse gas emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, and will fall to zero or below by 2100. However, specifically in terms of non-renewable energies such as peat bogs, the White Paper notes that:

'Fuels with higher carbon content (peat and coal) will become relatively more expensive and be replaced over time by fuels with lower carbon content, for example natural gas and renewables'.

It is significant as it was the first time a government has proposed the eventual elimination of fossil fuels from Ireland's energy system. The then Minister for Energy, Alex White, stated that *"high-carbon fuels like peat and coal will give way to lower-carbon or renewable alternatives in the short to medium term before fossil fuels are largely replaced by renewable energy sources by 2050. Greenhouse gas emissions from the energy sector will "fall to zero or below by 2100".*

5.5.2.8 National Peatland Strategy (2015-2025)

A National Peatlands Strategy was published by NPWS in 2016. This Strategy aims to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations.

In relation to the move away from peat extraction and a move toward bog rehabilitation and renewable energy, the Strategy notes the following:

P24 As part of Ireland's commitment to move towards a cleaner, more carbon efficient economy, means to reduce the dependency on peat as a source of fuel and horticultural compost will be fully explored.



P25 Consideration will be given to how best cut away bogs can contribute to a low carbon economy through their use as sites for renewable energy.

A10 The National Raised Bog SAC Management Plan will provide for the restoration of raised bog SACs.

P30 Coillte and Bord na Móna as the managers of significant tracts of peatlands on behalf of the Irish people will continue to show leadership in responsible management, rehabilitation and restoration of peatlands.

It is noted that Bord na Móna have already committed and moved away from peat extraction. The date for this change was targeted as 2030, however in October 2018, the Bord na Móna announced its intention to accelerate this strategy stating:

“Decarbonisation is the biggest challenge facing this planet. For Bord na Móna it presents both a serious challenge and a national opportunity. By accelerating the move away from peat into renewable energy, resource recovery, and new businesses we are supporting national policy and seizing the opportunity presented by decarbonisation. Standing still is not an option for Bord na Móna. We are embarking on a transition phase now which will see us become a leading provider of renewable energy on the Island of Ireland by 2026, a leader in high-value recycling and provider of a range of new low carbon goods and services. Allied to all of this, a key focus of our decarbonisation plan is ensuring that Bord na Móna remains a very significant employer in the Midlands of Ireland for the decades to come.”

In January of 2021, Bord na Móna formally ended all industrial peat extraction on its lands, marking a key milestone in its transformation into Ireland's leading climate solutions company. The company reiterated its commitment to the Brown to Green strategy that involves the transformation of Bord na Móna from a traditional peat business into a climate solutions company. The company is now fully focused on renewable energy generation, recycling and the development of other low carbon enterprises.

5.5.2.9 Historic Climate Change Strategies

The use of peat as a fuel source in Ireland has now effectively ended, following a significant shift in national and European climate policy. Historically, however, peat formed a central component of Ireland's electricity generation mix and was supported by successive national strategies due to its role in energy security and rural employment.

The National Climate Change Strategy 2000 recognised the relatively high carbon intensity of peat-fired electricity generation but supported measures to improve generation efficiency through the replacement of older peat-fired stations with newer, more efficient facilities. This approach sought to reduce emissions while maintaining the strategic role of peat within Ireland's energy mix.

Similarly, the National Climate Change Strategy 2007 continued to support the use of peat through the introduction of biomass co-firing, which was viewed as a transitional measure to reduce emissions while preserving fuel diversity and supporting employment in peat-dependent communities.

These historic strategies demonstrate that national policy at the time supported peat-fired electricity generation as an important component of Ireland's energy sector, reflecting its role in energy security and the economic development of the Midlands region.

5.5.2.10 Electricity Generating Infrastructure 2001 - 2020

The provision of peat-fired electricity generating infrastructure during the period 2001 - 2020 demonstrates the national policy context which historically supported peat extraction activities in Ireland. In the case of the Application Site, from 1950 to 2020 milled peat was the only form of peat produced, and this was used primarily to fuel Rhode Power Station during that development's operational life. In 2001, milled peat from the Application Site was delivered for the first time to the then newly commissioned Edenderry Power Station, Co. Offaly. Derrinlough Briquette Factory, Co. Offaly, first received milled peat from the Application Site in 2002, and from 2004 and 2005 peat from the Application Site began being transported to Lough Ree Power Station, Co. Longford and West Offaly Power Station in Shannonbridge, Co. Offaly, respectively.

Under the National Climate Change Strategy (2000) and the Green Paper on Sustainable Energy (1999), a number of peat-fired electricity generating plants were granted planning permission, reflecting national policy priorities at the time relating to energy security, fuel diversity and support for indigenous energy resources. These include:

- Lough Ree Peat Fired Electrical Power Generating Station, Lanesboro (An Bord Pleanála Ref. PL 14.125540); and
- Shannonbridge Peat Fired Electrical Power Generation Plant (An Bord Pleanála Ref. PL.19 125575).

The National Climate Change Strategy (2000) acknowledged the high carbon intensity of peat but supported its continued use for electricity generation subject to efficiency improvements, stating:

"To the extent that peat continues to be used for power generation, its use will become more efficient with the commissioning of the new Clonbullogue plant in 2001, and the construction of two further new plants which will progressively replace all remaining, low efficiency, peat generation. These new plants will use the minimum amount of peat compatible with economic operation within the Public Service Obligation (PSO), and their construction, operation and management will be benchmarked on best industry practice to maximise the efficient use of peat" p. 33.

In granting approval for this electricity generating infrastructure, An Bord Pleanála stated the following:

"National security of supply is an important factor in the consideration of the acceptability of peat fired stations. It is estimated that the demand for electricity will increase by 65% between 1998 and 2010 (Green Paper on Sustainable Energy)."

All peat fired electricity generating plants referenced above ceased operations in 2020, marking the effective end of peat fired electricity generation in Ireland. In parallel with this shift in energy policy, Bord na Móna ceased peat extraction at the Application Site in 2020 and subsequently ceased the combustion of peat for electricity generation at Edenderry Power Station in December 2023.



This transition reflects the evolution of national climate and energy policy away from peat-based electricity generation towards renewable energy, peatland rehabilitation and climate resilience, as set out in the current statutory climate policy framework.

5.5.3 Regional Policy Context

5.5.3.1 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031

Prior to the adoption of the Regional Spatial and Economic Strategy (RSES) in June 2019, there was no regional-level spatial policy specifically addressing peatlands in the Eastern and Midland Region.

The Regional Spatial and Economic Strategy (RSES) came into effect on 28 June 2019 and provides a high-level development framework for the Eastern and Midland Region that supports the implementation of the NPF and the relevant economic policies and objectives of Government. It provides a 12-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Eastern and Midland Regional Assembly (EMRA). The RSES includes guiding principles to be applied to development on peatlands, including:

- Consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy extraction;
- Consideration of habitats and species of environmental significance;
- Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/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.

Other Policies in the RSES which are indirectly relevant to the Application Site include:

RPO 3.7, which requires local authorities to have regard to environmental and sustainability considerations in meeting sustainable development targets and climate action commitments. The Objective highlights the need for appropriate site and route selection for development, having regard to environmental constraints including biodiversity, flooding, landscape, cultural heritage, material assets and service capacity;

RPO 4.8.4, which supports the rural economy and initiatives relating to diversification, agri business, rural tourism and renewable energy in order to sustain employment opportunities in rural areas;

RPO 6.9, which supports the implementation of Regional Enterprise Plans and seeks to ensure that the Midlands Region is well positioned to address the challenges and opportunities associated with the transition to a low carbon economy and renewable energy;

RPO 7.35, which requires EMRA, in conjunction with local authorities in the Region, to identify Strategic Energy Zones suitable for larger scale energy generating projects, while also recognising the role of community and micro energy production in urban and



rural areas. This Objective emphasises that all environmental constraints must be addressed as part of the identification and assessment of such zones; and

RPO 7.36, which requires local authority planning policy to adhere to the principles and guidance set out in national publications relating to wind energy development, including relevant Departmental guidance and Codes of Practice on community engagement and sustainable energy development.

The RSES supports an increase in the amount of new renewable energy sources in the Region. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National and Regional Policy Objectives outlined in this Strategy.

EMRA formally commenced a review of the RSES in 2026 and published a Strategic Issues Paper as part of the pre-draft consultation stage. Submissions closed on 22 May 2026. EMRA describes this as the first stage toward shaping the next RSES.

5.5.4 Local Policy Context

5.5.4.1 County Development Plans

In respect of historical activities carried out at the Application Site between 1988 and 2020, it is necessary to consider historical county development plans which would have been in force and supportive of peat extraction activities that were being carried out.

The Application Site is located within the counties of Offaly, Meath and Westmeath therefore all three of the counties County Development Plans have been assessed within this local policy section. Given the peat extraction commenced in 1950 and the earliest County Development Plan is in 1967, a review of all CDPs has been provided.

Table 5-3 provides a summary of the relevant CDPs relevant to the Project during the peat extraction Phase.

Table 5-3: 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.

5.5.4.2 Offaly County Development Plan 2021 - 2027

The current Offaly County Development Plan 2021–2027 was adopted on 10 September 2021 and came into effect on 22 October 2021. The Plan sets out the strategy for proper planning and sustainable development County Offaly over the plan period and is informed by National Planning Framework and Regional Spatial and Economic Strategy and relevant Section 28 Guidelines. It is accompanied by:

- Appropriate Assessment (AA) Screening Report and Natura Impact Report (NIR)
- Strategic Environmental Assessment (SEA)
- Strategic Flood Risk Assessment (SFRA)
- Record of Protected Structures (RPS)
- Housing Strategy including a Housing Need Demand Assessment (HNDA)
- Wind Energy Strategy

The Strategic Vision for the Plan is:

‘To create a sustainable and competitive county that supports the health and wellbeing of our people and places, from urban to rural, with access to employment opportunities supported by high quality housing and physical, social and community infrastructure for all, in a climate resilient manner and with respect for our biodiversity.’

Chapter 3 addresses climate change mitigation and adaptation within a global, European, national and regional policy context. The overarching aim is to support a transition to a low carbon, climate resilient and environmentally sustainable county, while recognising the role of natural capital and ecosystem services.

The CDP explicitly addresses the phasing out of peat fired electricity generation (Section 3.4.1), recognising the associated impacts on employment and communities in County Offaly and the



wider Midlands region. The Plan supports a Just Transition, including peatland rehabilitation and restoration, as well as retraining and reskilling of workers affected by the decline of peat-based energy.

The Plan identifies Offaly's extensive peatlands as having significant potential to accommodate renewable energy, energy storage and emerging technologies, stating that they offer opportunities for development at a regional scale, including battery energy storage and related infrastructure.

The CDP includes a detailed policy framework guiding the transition of industrial peatlands to sustainable after-uses, including:

CAEP 16: Support for a comprehensive after use framework for industrial peatlands...

CAEP 17: Support for the investigation and facilitation of a Green Energy Hub...

CAEP 18: Support for investigating the feasibility of energy parks...

CAEP 19: Requirement for planning applications on or near peatlands...

CAEP 20: Commitment to supporting the implementation of the National Peatlands Strategy 2015...

CAEO 06: Objective to secure EU and national funding...

CAEO 07: Objective to ensure renewable energy development does not adversely affect peatland rehabilitation...

Overall, the CDP establishes a clear policy direction recognising the historic role of peatlands while supporting transition to low-carbon, sustainable uses.

5.5.4.3 Offaly County Development Plan 2014-2020

The Offaly County Development Plan 2014-2020, adopted on 15 September 2014, identifies the challenge of achieving a balance between national renewable energy and the sustainable use of the County's energy resources. In this context, the Plan acknowledges the historic role of peatlands in energy production, while also recognising the non-renewable nature of peat and the limited remaining lifespan of peat fired electricity generation.

The CDP recognises Bord na Móna as the largest single landowner in County Offaly and identifies cutaway bogs as a significant future land resource, with potential to support both employment generation and habitat restoration. The Plan notes that, over time, parts of these areas may return to a more natural state and contribute to the green infrastructure network of the county (Section 2.3.2).

While peat fired power stations were still operational during the plan period, the CDP acknowledges that the role of carbon-based energy production would be time limited. Notwithstanding this, the Plan recognises that peat would continue to form part of the electricity generation mix in the short to medium term (Section 3.4.2). In this context, cutaway bogs are identified as the baseline landscape condition, with restoration or alternative development, such as that proposed at the Application Site, representing a planned future change. The Plan also acknowledges the value of existing energy and transmission infrastructure associated with former peat fired power generation.

A number of policies within the CDP are relevant to the Project and are summarized below.

Chapter 2 (Economic and enterprise strategy) includes policies supporting the redevelopment of brownfield and previously developed sites, particularly those with antecedent industrial uses, including former Bord na Móna works and ESB facilities, for enterprise and employment creation (Policy Entp 07).

The Plan also supports employment growth in sectors including peatlands, energy, agriculture, horticulture, tourism, and food production (Policy RDP 11). The potential of cutaway bog sites for wind energy development is specifically recognised.

Chapter 3 (Energy strategy) identifies cutaway bogs as particularly suitable locations for wind energy development, noting their large, open, and uninterrupted nature, existing internal access routes (including former bog railway corridors), and relative distance from dense population centres. The Plan highlights that such characteristics can facilitate energy development while minimising impacts on public roads, residential amenity, and the wider landscape.

5.5.4.4 Offaly County Development Plan 2009-2015

The Offaly County Development Plan 2009-2015, adopted on 19 January 2009, replaced the Offaly County Development Plan 2003-2009. The Plan included a number of policies related to the historical and future use of peatlands and cutaway bogs within County Offaly, including those associated with the Application Site.

At the time of preparation of the Plan, the after use of cut away bogs and alternative forms of development were identified as key considerations for the future planning and sustainable development of the County.

Chapter 3 of the Plan (overall strategy) supports employment generation through the reuse of industrial peatlands and states the Council's intention to work closely with Bord na Móna to facilitate appropriate redevelopment proposals. The Plan expressly supports the investigation of alternative uses for cutaway bogs, where suitable on planning grounds, to deliver economic and employment benefits.

Chapter 6 of the Plan (Employment, economy and enterprise) highlights the 32,400 hectares of peatlands in Bord na Móna ownership within the county as a significant development resource. These lands are identified as having potential for industrial and business-related uses, particularly renewable energy development, including wind and biomass.

The Plan also supports the redevelopment of disused brownfield sites, including former works by the Bord na Móna and ESB power stations, as a means of promoting enterprise and employment creation (Policy P06 11).

Chapter 10 (rural development) supports the development of peatlands for appropriate alternative uses, subject to environmental protection measures and applicable nature conservation designations.

Chapter 12 (Environment and climate) recognises national and international climate commitments and supports measures to reduce greenhouse gas emissions, consistent with the National Climate Change Strategy and the Kyoto Protocol. The CDP commits to implementing relevant EU and Irish environmental legislation and to cooperating with the EPA in relation to environmental licensing of scheduled activities within the county.



Chapter 15 (Natural heritage) identifies peatlands as a defining landscape and heritage feature of County Offaly. While supporting continued protection of designated boglands, the Plan also commits to the preparation of a biodiversity management strategy for peatlands, in cooperation with Bord na Móna and other relevant authorities.

Chapter 16 (Landscape and amenities) seeks to protect and enhance landscape character and amenity value across the county. Cutaway bogs are classified as a moderately sensitive landscape type. The Plan refers to Lough Boora as a prototype example of cutaway bog re use and acknowledges that some cutaway bog landscapes may be suitable for sensitively designed development, including renewable energy and industrial uses, where appropriate.

5.5.4.5 Offaly County Development Plan 2003-2009

The CDP recognises boglands as a major natural and archaeological resource within County Offaly and recognises the continued importance of peatland development to employment.

The CDP supported the conservation of a representative sample of peatlands and committed the Council to working with relevant bodies, including Dúchas and the Irish Peatland Conservation Council, to undertake a Bog Conservation Study of the county's remaining peat resources.

The Plan also places strong emphasis on the need for strategic planning for the after use of industrial peatlands (cutaway bogs), in accordance with the Offaly CDP 2003-2009.

5.5.4.6 Offaly County Development Plan 1995

The Offaly County Development Plan 1995 recognised the county's boglands as an important natural, archaeological and economic resource. The Plan acknowledged the continuing importance of peat extraction to employment and the local economy while also recognising the need to protect representative peatland habitats.

The Plan supported the conservation of a representative sample of peatlands and committed the Council to working with relevant bodies, including Dúchas and the Irish Peatland Conservation Council, to undertake a Bog Conservation Study of the county's remaining peatland resource.

The Plan also recognised the importance of planning for the future use of cutaway bogs following the cessation of peat extraction and highlighted the need for a coordinated approach to the long-term management of these lands.

The Council stated: "The development of the County's peat resources will be promoted and facilitated."

At the same time, the Plan recognised the value of peatlands for conservation, tourism, amenity, education and research purposes and set an objective to secure at least 4% of the county's original peatland area for conservation.

The Plan further acknowledged the need for a comprehensive strategy for the future use of cutaway bogs, stating:

"The Council will seek the formulation of a comprehensive integrated land use plan for the future development and utilization of the large areas of cutaway bog which now exist



in the county... it is important to avoid piecemeal or uncoordinated use/development of this major resource."

The Plan noted that approximately 32,400 hectares (80,000 acres) of peatland in County Offaly were in Bord na Móna ownership, underlining both the scale of the resource and the strategic importance of its future management.

5.5.4.7 Offaly County Development Plan 1987

The Offaly County Development Plan 1987 reaffirmed the significance of peatlands and peat extraction as an employment opportunity County Offaly. At the time of publication, over 50% of the industrial jobs in the county were provided by the joint activities of Bord na Móna and the ESB.

The importance of Bord na Móna and the ESB on the local economy is recognized in the CDP, which stated:

"Over half the industrial jobs in County Offaly are provided by the joint activities of Bord na Mona and the E.S.B. Of the total 2,800 jobs provided by the two, 2,200 are provided in the seven Bord na Mona works and 600 in the three E.S.B Stations. This does not include Bord na Mona seasonal work which amounts to approximately 800 jobs every year. Many of the rural communities in the County are heavily dependent on peat-based employment. On a county-wide basis it is estimated that approximately 12,000, or one-fifth of the total population are directly dependent on this type of employment."

The 1987 CDP also acknowledged that peat resources were finite and warned that the depletion would become a major concern in future years. The Plan noted the need for OCC to cooperate with other agencies to identify new development initiatives and a broader employment strategy to support the County.

5.5.4.8 Offaly County Development Plan 1967

The Offaly County Development Plan of 1967 recognises the significance of peatlands and peat extraction to the County Offaly. At the time of publication, 60% of the total production of Bord na Móna was attributable to peat extraction on peatlands located in County Offaly.

The importance of the industrial employment associated with Bord na Móna and peat extraction is stated within the CDP:

'Turf production, since the event of the Turf Development Board Ltd. in 1934 and its successor, Bord na Móna, in 1946, has become of vital importance. In fact, it can be regarded as second only to agriculture in the county's employment structure.'

Records within the CDP show that, at the time, there was a total of 1,791 people working in the turf production industry, which represented 9.1% of total employment in the county.

While there was clear optimism for the continued expansion of peat extraction operations and employment growth in the county, the Plan estimated that the bogs of Offaly would be nearing the end of their commercial peat extraction lives by the turn of the century.

In this context, the 1967 CDP highlighted the need to expand research into the potential future uses of peatlands which would provide alternative employment opportunities, especially to the towns of Ferbane, Kilcormac, Rhode, and Shannonbridge.



5.5.4.9 Westmeath County Development Plan 2021 – 2027

The Westmeath County Development Plan (WCDP) (2021 – 2027), which came into effect on 3 May 2021, provides the strategic framework for land-use planning within the county. The Plan is underpinned by 11 Strategic Aims, of which those most relevant to the Derrygreenagh Bog Group relate to Climate Action, Natural Heritage and Green Infrastructure, and Rural development. These aims include:

- Climate Action: supporting a transition to a low carbon and climate resilient county, with a strong focus on reducing energy demand and greenhouse gas emissions through mitigation and adaptation measures.
- Natural Heritage and Green Infrastructure: protecting and enhancing biodiversity and green infrastructure networks to deliver environmental, social and economic benefits.
- Rural: supporting rural economic development and diversification, including energy production, tourism, recreation and emerging rural enterprises, within the context of sustainable land and resource management.

Chapter 12 (Natural Heritage and Green Infrastructure) of the WCDP identifies peatlands as a characteristic and significant landscape feature of County Westmeath, covering approximately 17,000 hectares (c. 9% of the county area). The Plan recognises peatlands as among the oldest surviving ecosystems, assigning particular importance to their roles in:

- biodiversity conservation,
- climate regulation as long-term carbon sinks,
- water filtration and hydrological regulation.

The WCDP highlights that peatlands in a natural or rehabilitated state constitute the most important long term carbon store in the terrestrial biosphere. Given the scale and extent of peatlands within the county, including the Application Site, the Plan acknowledges their significant potential to contribute to climate change mitigation, notably through rehabilitation and re wetting, alongside socio economic opportunities associated with green industries and technologies.

Key peatland related policies include:

CPO 11.6 / CPO 12.69: Support collaboration between local authorities, Bord na Móna and relevant stakeholders on integrated peatland management for a Just Transition, including rehabilitation and re wetting.

CPO 12.2: Support implementation of the National Biodiversity Plan, All Ireland Pollinator Plan and National Peatlands Strategy.

CPO 12.66: Control peat extraction where significant environmental impacts may arise, in the interest of biodiversity protection and climate action.

CPO 12.67: Promote best practice peatland conservation, restoration and educational initiatives, subject to ecological and appropriate assessment.

The WCDP identifies the transition to a low carbon and green economy as a core guiding principle for economic development. Westmeath County Council recognises the Green Economy as an area of significant growth potential, supporting employment opportunities



linked to research, innovation and clean technologies, in line with national and international climate policy.

Chapter 9 (Rural Westmeath) confirms continued support for rural economic diversification, including energy production and carbon reduction initiatives, consistent with regional Just Transition objectives.

Relevant supporting policies include:

CPO 5.51: Position the county to benefit economically from the transition to a low carbon economy.

CPO 5.52: Support enterprise development and employment creation across green economy sectors.

CPO 5.58: Encourage rural diversification through sustainable development and skills investment.

CPO 5.59: Support renewable energy initiatives contributing to a low carbon transition.

CPO 9.34: Support rural employment through diversification, agri business, tourism and renewable energy.

The WCDP supports the sustainable use of peatlands in contributing to national climate objectives, while safeguarding environmental sensitivities. In this context, the following policies are considered particularly relevant to the regularisation of peat extraction activities and associated works at Derrygreenagh Bog Group, alongside rehabilitation measures required under IPC Licence Ref. P0501-01:

CPO 10.139: Support renewable energy development and emissions reduction initiatives, with particular regard to the Habitats Directive.

CPO 10.140: Facilitate climate mitigation measures aligned with the Westmeath Climate Change Adaptation Strategy.

CPO 10.145: Direct large scale energy developments, including wind energy, towards cutaway peatlands, subject to environmental, landscape and biodiversity safeguards.

Overall, the WCDP 2021–2027 provides a clear and supportive policy framework for the sustainable management and transition of peatlands in County Westmeath, balancing biodiversity protection, climate action, rural economic development, and appropriate renewable energy use. This policy context supports the continued management, rehabilitation and future use of the Application Site in line with national and regional climate and Just Transition objectives.

5.5.4.10 Westmeath County Development Plan 2014-2020

The Westmeath County Development Plan 2014–2020 came into force on the 18 of February 2014 and has since expired. The Plan contains a number of strategic aims and policies relevant to the Application Site, particularly in relation to peatlands, renewable energy and rural development.

At a strategic level, the WCDP supported:



- The role of rural areas in sustaining the rural economy, including energy production, agriculture, forestry, tourism, recreation and emerging rural enterprises;
- The growth of the renewable energy sector within the county;
- the protection of the county's natural, archaeological and cultural assets, including landscapes and water resources; and
- The development of Westmeath as a destination for outdoor recreation, supported by high quality and well managed landscapes.

Chapter 5 (Natural and Built Heritage) of the WCDP contains the following relevant policies:

P PTL1: Protection of designated peatlands and bog landscapes, including their ecological, archaeological, cultural and educational value.

P PTL4: Support for forward planning for the sustainable and environmentally sensitive after use of industrial peatlands, including cutaway bogs, in cooperation with adjoining local authorities and in line with national and regional frameworks.

P PTL5: Control of peat extraction where significant environmental impacts may occur.

The Plan also set objectives to:

O PTL2: Investigate the planning status of peat extraction and take enforcement action where necessary.

O PTL3: Work with bodies such as NPWS and Coillte on peatland conservation.

O PTL5: Promote best practice in peatland conservation, management and restoration in partnership with relevant stakeholders.

O PTL6: Support the preparation of a Sustainable Holistic Management Plan for industrial peatlands, recognising their role in carbon sequestration.

The WCDP also acknowledged the historic importance of peat extraction through policies supporting:

- Protection and sensitive restoration of industrial heritage sites (P IH1); and
- The preparation of an inventory of industrial heritage assets and public awareness of their value (O IH1).

Chapter 10 (Energy and Communications) of the WCDP reflects an emerging transition from peat-based energy towards renewable energy with policies to:

P-EN1: To promote renewable forms of energy where it is consistent with the proper planning and sustainable development of an area.

P-EN5: To support the sustainable development of the infrastructure required to assist the Midland Region in the delivery of renewable energy, particularly in the context of the need to make a transition from peat to renewable energy.

Overall, the WCDP 2014–2020 demonstrated a clear policy shift towards renewable energy and sustainable after use of peatlands, while continuing to recognise the historic, cultural and industrial legacy of peat extraction within County Westmeath.



5.5.4.11 Westmeath County Development Plan 2008–2014

The Westmeath County Development Plan (WCDP) 2008–2014 was adopted on 25 January 2008 and came into effect on 25 February 2008. The Plan contains a range of objectives and policies relevant to peatlands, cutaway bogs, renewable energy and future land use, all of which are pertinent to the Application Site.

The Plan places strong emphasis on the protection and sustainable management of the county's natural heritage, including peatlands. Key objectives and policies include:

- Protection and enhancement of natural heritage, biodiversity, landscape and environment as non-renewable resources and defining features of the county (O EH2).
- Ensuring development avoids adverse impacts on wildlife habitats and species (O EH3).
- Conservation of peatlands to minimise impacts on biodiversity and archaeological and cultural heritage (P EH19; O EH14).
- Identification and mapping of peatlands of high local ecological value (O EH15).
- Control of peat extraction, both individually and cumulatively, where significant environmental impacts may occur (O EH16).
- Monitoring of development and waste permitting in proximity to peatlands (O EH17).
- Requirement for hydrological assessment of significant developments affecting peatlands (O EH18).
- Partnership working with relevant bodies, including NPWS and Coillte, to support peatland conservation (O EH20).

The WCDP explicitly acknowledges the finite nature of peat resources and the need to plan for their future use once extraction ceases. The Plan recognises that, within a 20–30 year timeframe, large areas of peatlands would become exhausted, creating significant tracts of cutaway bog with potential for alternative uses (P EH32). The Plan supports a balanced and planned redevelopment of cutaway peatlands, identifying potential uses including:

- habitat creation (woodlands, grasslands and wetlands),
- amenity and recreational uses (parklands and community spaces), and
- economic uses such as agriculture, forestry and wind energy (O EH19).

The Plan identifies cutaway peatlands as offering particular opportunities for renewable energy development:

P EH33 recognises that extensive cutaway peatlands are suitable locations for wind energy development.

P IF16 promotes renewable energy where consistent with proper planning and sustainable development.

P IF17 supports the incorporation of renewable energy technologies to meet energy demand in new development.

Overall, the WCDP 2008–2014 demonstrated a clear policy focus on transition from reliance on peat extraction toward the planned after use and redevelopment of cutaway peatlands.



5.5.4.12 Westmeath County Development Plan 2002–2008

The Westmeath County Development Plan (WCDP) 2002–2008 was adopted by the Council on 15 April 2002. The Plan contains a number of objectives and policies relevant to the historic use of the Derrygreenagh Bog and the wider peatlands of County Westmeath.

The WCDP placed a strong emphasis on employment creation and economic development, identifying the provision of appropriately zoned and serviced lands as a key mechanism for supporting industrial, manufacturing, technological and service activities within the county. The Plan also committed the Council to cooperating with Enterprise Ireland in the promotion and growth of indigenous and natural resource-based companies.

This policy context reflects explicit support for employment associated with natural resource industries, including peat extraction, and aligns with the role of Derrygreenagh Bog as a long-standing source of industrial employment within the county.

The Plan recognised the economic importance of extractive industries, noting their value as a significant source of employment in parts of County Westmeath. It stated that the Council would facilitate the exploitation of the county's natural resources where there was a proven need for a particular mineral or aggregate.

At the time of adoption of the WCDP 2002–2008, peat was regarded as an important source of energy and fuel, and these policies therefore indicate that peat extraction activities at Derrygreenagh Bog were broadly consistent with the Council's economic and industrial objectives under the Plan.

The WCDP also demonstrated an evolving awareness of the environmental, archaeological and heritage value of boglands, acknowledging that bogs contain a unique record of the past and support some of the oldest ecological communities, dating back over 10,000 years.

The Plan noted that raised bogs dominate in County Westmeath and described them as among the most significant remaining examples in Europe. In this context, the Council committed to working with statutory and other agencies to ensure that appropriate levels of protection were applied to boglands of ecological and scientific importance.

At the same time, the WCDP recognised that large areas of bog had already been exploited for peat, and that some areas formerly considered of scientific interest had subsequently been degraded as a result of extraction. The Plan acknowledged bogland as a major natural resource, while recognising that its productive use should be managed in a way that did not prejudice its heritage, amenity and future potential. The Council therefore committed to cooperating with governmental and non-governmental organisations to ensure that peatland development was undertaken in a balanced and sensitive manner.

Overall, the WCDP 2002–2008 reflects a policy context that was strongly supportive of peat extraction and natural resource-based employment, while recognising the ecological and heritage value of peatlands such as Derrygreenagh Bog.

5.5.4.13 Westmeath County Development Plan 1994

The Westmeath County Development Plan (WCDP) 1994 was reviewed in relation to the Application Site. The Plan contains specific policy recognition of the importance of boglands within County Westmeath, both as an economic resource and as an amenity and heritage asset.

The WCDP 1994 recognises boglands as a major natural resource, highlighting their role as a raw material for power generation and peat extraction, while also acknowledging their amenity value. The Plan states that the Council would consult with Bord na Móna, Teagasc and other appropriate bodies to ensure that bogland development was undertaken in a manner that did not prejudice future amenity potential.

The Plan further commits the Council to cooperating with interested parties to support the preservation of bogs identified as being of international importance, including Scraw Bog and Gariskil Bog. In addition, the Plan recognises the potential infrastructure impacts associated with bog development and provides for the levying of charges on developers where peat extraction activities adversely affected public roads, in order to fund required maintenance or improvements. Overall, the WCDP 1994 demonstrated that Westmeath County Council recognised peatlands as a strategic natural resource, central to energy production and employment at the time, while also showing early awareness of the importance of protecting amenity, heritage and future land use potential.

5.5.4.14 Westmeath County Development Plan 1986

The Westmeath County Development Plan (WCDP) 1986 was reviewed in relation to the Application Site. The Plan provides clear evidence of the importance of peat extraction and associated industries to employment and economic activity within the county at that time.

The WCDP notes that, in 1984, approximately 4,700 people were employed in the extractive and agricultural sectors, representing 23% of the total employed population in County Westmeath (20,390 persons). While this figure reflected a reduction of approximately 9.4% compared to 1979, the sector remained a major source of employment within the county.

This employment context demonstrates the significant role of peat extraction and related activities in supporting livelihoods during the period in which the Derrygreenagh Bog was operational.

The WCDP 1986 explicitly recognises the importance of boglands as a major natural resource, noting their role as a raw material for power generation and peat extraction, while also acknowledging their value as an amenity resource. The Plan states that it was Council policy to encourage the continued development of boglands, while at the same time seeking to preserve ecological balance, particularly within areas identified as being of scientific interest.

Overall, the WCDP 1986 reflected a planning policy framework that was strongly supportive of ongoing peatland development for energy production and employment, while also demonstrating early recognition of the need to safeguard ecological and amenity interests.

5.5.4.15 Meath County Development Plan 2021 – 2027

The Meath County Development Plan 2021 – 2027 (MCDP) came into effect on 3 November 2021 and sets out the policies, objectives and the overall strategy for the development of the County over the plan period. The Core Strategy (Chapter 2) of the MCDP identifies climate change as a cross-cutting theme underpinning the plan and recognises the central role of Meath County Council in supporting climate action measures at European and national levels, including the European Green Deal, the Climate Action and Low Carbon Development Act (2015), and the Just Transition Fund.

The MCDP includes overarching climate related objectives which align with higher-tier legislation and national climate policy including:

- *Supporting the implementation of the Climate Action Plan 2019 and facilitating measures to reduce greenhouse gas emissions across key sectors including electricity, enterprise, the built environment, transport, agriculture and waste.*
- *Supporting the National Climate Change Adaptation Framework through the County Development Plan and the preparation of a Climate Change Adaptation Plan in collaboration with relevant stakeholders.*

Drawing on the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and the National Peatlands Strategy 2015–2025, the MCDP highlights the strong relationship between the sustainable management of peatlands and climate action, biodiversity protection and ecosystem services.

The Plan defines the county's environmental and heritage assets as Green Infrastructure, described as:

“A strategically planned and managed network featuring areas with high quality biodiversity (uplands, wetlands, peatlands, rivers and coast), farmed and wooded lands and other green spaces that conserve ecosystem values which provide essential services to society”.

The MCDP recognises that some cutover peatlands have the potential to accommodate complementary uses, including renewable energy generation, habitat enhancement and public amenity, subject to appropriate environmental safeguards.

Key policies and objectives relevant to peatlands and the Application Site include:

HER POL 55: Recognition of the economic, social, environmental and physical value of Green Infrastructure.

HER OBJ 39: Support for partnership approaches to demonstrate best practice in peatland conservation, management and restoration, subject to ecological and appropriate assessment.

INF POL 35: Support for reducing greenhouse gas emissions through energy efficiency and renewable energy development in an environmentally acceptable manner.

INF OBJ 39: Facilitation of renewable energy development, including wind and bio energy, at suitable locations where environmental, landscape, biodiversity and amenity impacts are avoided.

The MCDP places strong emphasis on establishing a Green Economy within County Meath, recognising its importance in maintaining economic competitiveness in the context of decarbonisation and the transition to a low carbon economy. The Plan defines the Green Economy as encompassing sectors that provide goods and services in a sustainable manner, reduce environmental impacts and support the circular economy, including enterprises such as Bord na Móna operating as climate solutions companies.

The MCDP identifies significant opportunities for indigenous enterprise development, particularly within rural areas, and seeks to promote economic activities that align with climate action objectives. This includes policy *ED POL 19: Support for sustainable agriculture, agri food, forestry, renewable energy and other rural enterprises at suitable locations throughout the county.*

The MCDP supports the development of green energy infrastructure for both local consumption and export to the national grid. The Plan also supports industries and businesses that generate energy on site and export surplus energy, where such development aligns with proper planning and environmental protection.

In this policy context, the regularisation of the planning status of peat extraction works and associated activities at the Application Site represents an important first step in securing the sustainable management and future transition of the site, consistent with the MCDP's objectives for climate action, renewable energy, rural economic development and the sustainable use of peatlands.

5.5.4.16 Meath County Development Plan 2013-2019

The Meath County Development Plan (MCDP) 2013–2019 was adopted on 17 December 2012 and came into effect on 22 January 2013. The Plan has since expired and has been superseded by the Meath County Development Plan 2021 - 2027. Notwithstanding this, the 2013 - 2019 Plan provides important policy context for the historical and transitional phase of development at the Application Site.

Section 8.1.3 of the MCDP 2013–2019 sets out the Planning Authority's commitment to sustainable energy policy, in line with the Government White Paper "Towards a Sustainable Energy Future for Ireland 2007–2020". The Plan recognised:

"the range of new and developing technologies that can contribute to minimising greenhouse gas emissions and to securing a greater proportion of our energy needs from renewable sources".

The Plan identified onshore wind energy as a key renewable energy option for County Meath and included an objective for Meath County Council to investigate the renewable energy potential of the county, with a view to preparing a dedicated renewable energy strategy.

The MCDP 2013–2019 included specific policies and objectives in relation to the protection and future management of peatlands, including:

NH POL 11: To ensure that peatland areas designated (or proposed for designation) as NHAs, SACs or SPAs are conserved for their ecological, archaeological, cultural and educational significance.

NH OBJ 4: To work in partnership with relevant stakeholders on a suitable peatland site(s) to demonstrate best practice in sustainable peatland conservation, management and restoration techniques and to promote their heritage and educational value subject to Ecological Impact Assessment and Appropriate Assessment Screening as appropriate.

The MCDP 2013–2019 reflects a period of policy transition, with a clear shift towards renewable energy, greenhouse gas reduction and enhanced environmental protection. At the same time, the Plan acknowledges the declining role of peat as a fuel source, which aligns with the later stages of peat extraction at the Application Site.

5.5.4.17 Meath County Development Plan 2007-2013

The Meath County Development Plan (MCDP) 2007–2013 was adopted on 2 March 2007 and came into effect on 22 March 2007. The Plan has since expired. However, it provides important policy context relevant to the historical operation and landscape setting of the Application Site.

Chapter 8 of the MCDP places strong emphasis on the protection of the county's natural, archaeological and landscape heritage. Relevant policies include:

HER POL 102: Requirement to have regard to the natural and cultural heritage of the county when pursuing objectives related to transport and other infrastructure.

HER POL 104: Avoidance of visually obtrusive development - including windfarms, large scale enterprise, extractive industries and telecommunications structures - in fragile landscapes, such as areas of Special Visual Quality, archaeological landscapes, and areas adjacent to protected monuments and structures.

These policies demonstrate early planning sensitivity to landscape character and visual impact, particularly in areas of high heritage value.

The MCDP 2007–2013 includes specific provisions for the protection of peatlands:

HER POL 18: Conservation and appropriate management of peatlands designated, or proposed for designation, as NHAs or SACs, in order to protect their ecological, archaeological, cultural and educational significance.

HER POL 55: Protection of peatlands and archaeological features, including those listed in the Record of Monuments and Places and newly discovered sub surface remains.

These policies indicate that while peatlands were recognised as sensitive environments, their protection was primarily directed towards designated and high value heritage areas.

The Plan further reinforces heritage protection through strategic policies, including:

HERITAGE SP 1: To protect the physical landscape and visual character of the County.

HER POL 88: Support for the sustainable development of rural communities, provided that environmental, landscape and heritage resources are not compromised.

HERITAGE SP 2: To protect the historic and archaeological landscapes of the County.

Overall, the MCDP 2007-2013 reflects a policy framework that prioritised the protection of landscape character, heritage assets and designated peatlands, particularly in visually or archaeologically sensitive areas. At the same time, the Plan sought to balance heritage protection with the sustainable development of rural communities.



5.5.4.18 Meath County Development Plan 2001

The Meath County Development Plan 2001 was the statutory land-use framework adopted by Meath County Council on 5 March 2001. It guided spatial development, zoning and infrastructure within County Meath and was superseded by the Meath CDP 2007-2013.

The Meath County Development Plan (2001) recognised peat extraction as an established use within the rural landscape of the county, particularly within the midlands. The Plan emphasised the protection of landscape character and environmental quality, noting that existing development activities, including peat extraction, can give rise to environmental pressures such as land degradation, habitat loss and landscape change.

While the Plan does not preclude peat extraction, it supported the control of development to ensure that impacts on landscape character, visual amenity and environmental control were appropriately managed.

The CDP (2001) identified landscape classifications within the County and recognised the rural parts of Meath have been analysed for their visual characteristics with a view of offering a clearer picture to developers and others as to the sensitivity of various categories of development in areas with differing abilities to absorb development. The extent of these areas is depicted on the Rural Detail Maps, and an extract is shown below.

The Application Site is shown in the above Area of Visual Quality Map as a red hatching which is the eastern part of Derryhinch Bog and is identified as VQ 11 rural and agricultural land and bogland areas to the north are shown as VQ 10. Table 5-4 provides a summary of the visual quality groups relevant to the application site.

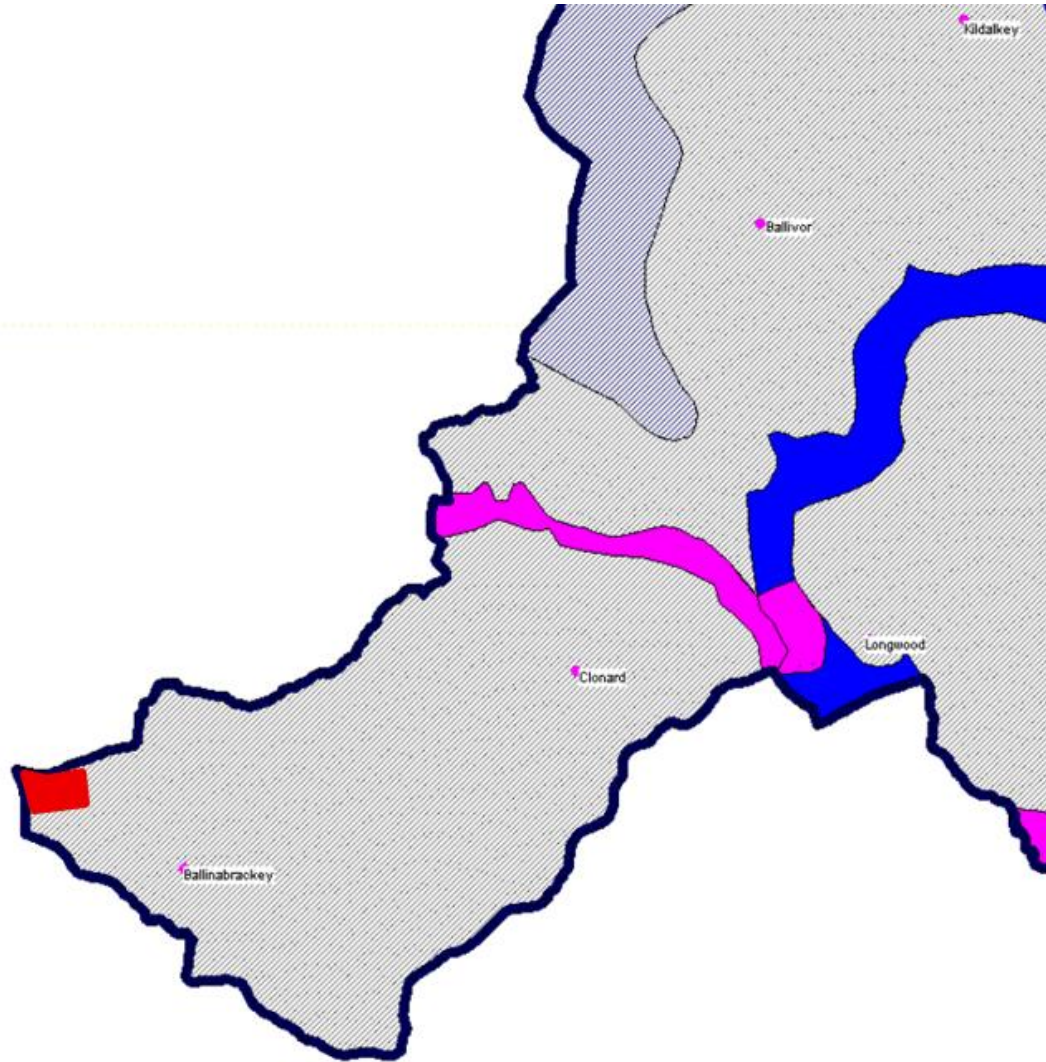


Figure 5-2: Extract of the Draft Meath County Development Plan (2001) Area of Visual Quality Map

Table 5-4: Landscape Classification Relating to the Rural Detail Map (Source: Meath County Development Plan 2001)

Visual Quality (VQ) Group	
Characteristics	Sensitivities
Areas VQ 10: Bogland Areas These areas, primarily to the west of Ballivor and Bohermeen are relatively isolated visually and functionally. They are difficult to penetrate and in the case of the Ballivor bog, are working peat extraction centres.	These areas by virtue of their insular visual qualities are not sensitive to development such as masts, wind energy complexes and cut away bog uses such as major afforestation.
Areas VQ 11: Rural and Agricultural These parts of the county make up the majority of its area in that they comprise of normal rolling lowland pastoral landscapes that apart from occasional ridges or prominent areas, are not particularly sensitive.	These areas can absorb quite effectively appropriately designed and located development in all categories including masts and wind energy installations, afforestation and agricultural structures.

5.5.4.19 Meath County Development Plan 1994

The Meath County Development Plan 1994 demonstrates a strong policy emphasis on supporting industrial development and employment generation across the county, including in rural areas. The Planning Authority actively encouraged the expansion of existing industries and the establishment of new enterprises, recognising the need to offset the decline in agricultural employment through growth in the industrial and service sectors.

Within this context, the Derrygreenagh Bog Group was considered an important source of local employment, with peat extraction forming part of the wider industrial and extractive economy. The Plan acknowledged the economic and employment value of extractive industries generally, and explicitly supported the development of peat resources, subject to the protection of environmentally sensitive sites.

The Plan also recognised the potential for alternative and complementary uses of boglands, including tourism-related development, indicating an early awareness of the long-term economic and land-use potential of peatland areas.

Overall, the 1994 Plan provides a supportive historical policy context for peat extraction activities at Derrygreenagh, particularly in terms of rural employment creation and industrial development, while also recognising the need to balance such activities with environmental considerations.

5.6 CONCLUSION

Historically, the extraction of peat at the Application Site was supported by national, regional and local planning policy and legislation, reflecting the strategic importance of peat as an indigenous energy resource and a major source of employment at the time. As described throughout this remedial EIAR, the Project has evolved over a long period and is assessed across three distinct timeframes, referred to as the Project Phases:

- **Peat Extraction Phase:** peat extraction activities and all ancillary works 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.

Over the course of the Project Phases, there has been a clear and progressive shift in international, European, national and local policy away from carbon intensive energy sources and towards the cessation of peat extraction, the rehabilitation of peatlands for carbon sequestration and habitat regeneration, and the development of renewable energy technologies as alternatives to fossil fuels. European climate objectives, including targets for a largely carbon free energy system by 2050, together with national climate legislation and policy, place increasing emphasis on this transition.

It is within this evolving energy and climate policy context that the regularisation of peat extraction activities by Bord na Móna at the Application Site is justified. Regularisation provides the appropriate planning framework through which the historic Peat Extraction Phase, the Current Phase of site management, and the future Remedial Phase can be fully considered in the round, and through which rehabilitation and future sustainable development, including that of renewable energy projects, on cutover peatlands can be comprehensively managed in line with contemporary policy objectives.

The continued rehabilitation of the Application Site will preserve and enhance peatland ecosystems, support habitat regeneration and biodiversity, and contribute to carbon sequestration, thereby assisting in the delivery of the climate action and environmental objectives set out in the applicable planning policy frameworks. Further detail on these measures is provided in the Cutaway Bog Decommissioning and Rehabilitation Plans contained in Appendix 4-3.

As evidenced throughout this remedial EIAR, Bord na Móna has transitioned away from peat extraction and is now focused on renewable energy development and peatland rehabilitation, consistent with European, national, regional and local planning policy. Continued alignment with these objectives is dependent on the regularisation of peat extraction and ancillary activities at the Application Site, which represents a necessary and proportionate step in facilitating the sustainable long-term management and future use of the site.



5.7 REFERENCES

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