

Fairgreen House
Fairgreen Road
Galway
H91 AXK8
Tel: +353 (0)91 565211
Email: info@tobin.ie

Block 10-4,
Blanchardstown Corporate
Park
Dublin
D15 X98N
Tel: +353 (0)1 8030401
Email: info@tobin.ie

Market Square
Castlebar
Mayo
F23 Y427
Tel: +353 (0)94 9021401
Email: info@tobin.ie

Unit 4, Crescent Court,
St. Nessan's Road,
Dooradoyle, Limerick
V94 V298
Tel: +353 (0) 976 262
Email: info@tobin.ie

First Floor,
Carroll House,
15/16 Stephen Street, Sligo
F91 ADK4
Tel: +353 (0)71 931 8844
Email: info@tobin.ie

Our Ref: 11400

1st April 2025

Your Ref: SI14.318974 (Pre-Application Consultation)

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

RE: Substitute Consent on lands within the Derryadd, Derryaroge, and Lough Bannow Bogs, Co. Longford relating to industrial scale peat extraction and associated works

Dear Sir/Madam

On behalf of our client Bord na Móna Energy Limited (hereafter referred to as the Applicant), please find enclosed a planning application for substitute consent to regularise industrial scale peat extraction and associated works within the Derryadd, Derryaroge, and Lough Bannow Bogs located within the townlands of Annaghbeg, Annaghmore, Ards, Ballynakill, Barnacor, Cloonbearla, Cloonbony, Cloonbrock, Cloonfiugh, Cloonfore, Cloonkeel, Cloontabeg, Cloontamore, Coolnahinch, Corlea, Corralough, Derraghan Beg, Derraghan More, Derryad, Derryaroge, Derryart, Derrygeel, Derryglogher, Derrynaskea, Derryoghil, Derryshannoge, Grillagh, Kilmakinlan, Kilnacarrow, Mosstown, Mount Davys, and Rappareehill at Lanesborough, County Longford.

This application is being made directly to An Bord Pleanála for 'Substitute Consent' under the provisions of Section 177E of the Planning and Development Act 2000, as amended. A pre-planning consultation meeting took place with the Board on the 8th May 2024, under section 177E (1A) of the Planning and Development Act, 2000, amended. (Case reference no. SI14.318974). The consultation is now closed and a copy of the associated correspondence with the Board is enclosed with this application form.

The Applicant

The Applicant is Bord na Móna Energy Ltd., which is a subsidiary of Bord na Móna plc, a Irish semi-state company. Bord na Móna has been serving communities for over 90 years, always rising to meet the needs of the day. It was founded in 1934 as The Turf Development Board Ltd to enhance national energy security through peat extraction and became Bord na Móna in 1946 with the commencement of the Turf Development Act 1946.

The functions of Bord na Móna as set out under Section 17(1) of the 1946 Act were:

Directors: M. Shelly (Chairman) C. McGovern (Managing Director) E. Connaughton (Company Secretary)
B. Downes D. Grehan M. McDonnell J. McGrath
B. Carroll S. Tinnelly J. O'Flaherty

Technical Directors: B. Gallagher B. Heaney C. Kelly T. Mackey D. Meade O. Fitzpatrick P. Cloonan P. Cunningham

Associate Directors: M. Casey E. Fenton L. Kennedy P. O'Connor B. Rudden M. Geraghty S. Ryan R. Murtagh K. Gallagher

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

Today, the company has radically changed its approach to face an even greater challenge: climate change. Bord na Móna have ended peat extraction and now focus on developing climate solutions in renewable energy, sustainable waste management, carbon storage, and biodiversity conservation. Ireland has committed to ambitious climate goals and Bord na Móna's climate solutions are helping to achieve them. Bord na Móna's vision is to help Ireland reach net zero greenhouse gas emissions by 2050.

Background to the Application

Drainage works commenced in 1949 at the Application Site at Derryaroge bog. The first peat extraction began at the Application Site in 1952 at Derryaroge bog. In 1960, the installation of drainage commenced at both Derryadd and Lough Bannow bogs, with peat extraction commenced in those bogs in 1964. Initially, the sod peat which was extracted was used domestically and to supply the Dublin market. The Electricity Supply Board (hereafter 'the ESB') commissioned Lanesboro Power Station in 1958, and it was fuelled by extracted peat from the Application Site. The capacity of Lanesboro Power Station was increased following the construction and commissioning of Unit 2 and Unit 3 within the plant in 1966 and 1983 respectively. Lanesboro Power Station was decommissioned in 2004, and replaced by Lough Ree Power Station, which was commissioned in 2004 by the ESB. Lough Ree Power Station was also fuelled by peat supplied by Bord na Móna, including from the Application Site. Lough Ree Power Station closed at the end of 2020.

Industrial-scale peat extraction ceased at the Application Site in July 2019, and the Applicant formally announced in January 2021 that peat extraction across all its land holdings would permanently cease. As part of the decommissioning process, the process of transporting remaining peat stockpiles off the bogs commenced following the cessation of peat extraction in July 2019. The stockpiles were transported to Lough Ree power station until its closure in December 2020 and then to Edenderry Power Station and Derrinlough Briquette Factory. The final stockpiles were transported off the bogs in November 2022.

Development Seeking Substitute Consent

The development for which substitute consent is being sought consists of peat extraction activities and all ancillary works including the following:

- Installation of surface water drainage infrastructure at Mountdillion Bog Group, specifically at Derryadd, Derryaroge and Lough Bannow Bogs to facilitate peat extraction activities from 1988 to present day;
- Vegetation clearance to facilitate peat extraction activity from 1988 to July 2019;
- Industrial scale peat extraction (milled peat) specifically at Derryadd, Derryaroge and Lough Bannow Bogs from 1988 to 2019;
- Use and maintenance of pre-existing ancillary supporting infrastructure and services to facilitate peat extraction (e.g., railway infrastructure, fixed fuel tanks, drainage (drains, silt ponds, pumps), machine passes etc.), from 1988 to July 2019;
- Control Measures associated with the above, inclusive of the IPC Licence measures (Ref. P0504-01) which commenced from 2000 onwards to the present day; and,
- All associated site development and ancillary works.

This application relates to development which is subject to an existing Integrated Pollution Control Licence (Reg. No. P0504-01).

The application includes a remedial Environmental Impact Assessment Report (rEIAR) and a remedial Natura Impact Assessment (rNIS). A detailed description of the proposed development is set out in the application documents.



For the purposes of the submitted rEIAR (Please refer to Chapter 4: Project Description), the Project is defined under three different timeframes termed 'phases' as:

- 'Peat Extraction Phase': peat extraction activities and all ancillary works at the Application Site from July 1988 to the cessation of peat extraction in July 2019 (July 1988 – July 2019).
- 'Current Phase': the management of the Application Site since July 2019 (July 2019 to present day).
- 'Remedial Phase': the activities intended to be carried out at the Application Site into the future.

All elements of the development carried out within and surrounding the site during the various phases of works on site as outlined above, have been considered and assessed under the rEIAR and rNIS submitted with this application.

The Applicant wishes to highlight that this application seeking substitute consent at the Application Site precedes a separate application for a proposed wind farm development, Derryadd Wind Farm, which is proposed to be developed on a site at Derryaroge, Derryadd and Lough Bannow bogs, located within the Application Site. The application for Derryadd Wind Farm will be made directly to An Bord Pleanála as 'Strategic Infrastructure Development' (SID) under the provisions of Section 37E of the Planning and Development Act 2000 as amended. This SID application is intended to be submitted to An Bord Pleanála within a number of weeks. The proposed Derryadd Wind Farm development has been considered and assessed within the rEIAR and rNIS submitted with this substitute consent application.

Enclosed Documents

The following documents are included in the application pack:

- Planning Application Documentation
 - Planning Application Form
 - EIA Portal Confirmation
 - Planning Application Fee payment receipt
 - Site Notice
 - Newspaper Notice
 - Cover Letter to Longford County Council
 - Planning Statement
- Planning Application Drawings
- Remedial Environmental Impact Assessment Report (rEIAR)
- Remedial Natura Impact Statement (rNIS)

Please find 6 no. hard copies and 1 no. electronic copy (USB format) of the above-mentioned documents enclosed with this letter.

I trust that you have all the information you require to progress the application. If, however, you have any queries or require to discuss any matter in detail, please do not hesitate to contact me.

We look forward to your decision in due course.

Yours sincerely,



Caroline Naughton
Senior Project Manager
For and on behalf of TOBIN
caroline.naughton@tobin.ie
+353 (01) 803 0401

