

## APPENDIX 2.1 : RECORDS OF CONSULTATION 2024

## Caroline Naughton

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**From:** David OConnor (Housing) <David.OConnor@npws.gov.ie>  
**Sent:** Friday 13 December 2024 09:07  
**To:** Caroline Naughton  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_50924

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Good morning Caroline,

The observations that I sent you refer to the Environmental Impact Assessment Report (rEIAR) for Wind Farm; Substitute Consent as per your attachment and not proposed Derryadd Wind Farm Development.

Regards,

David

**David O'Connor**  
*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigi an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

—  
[David.oconnor@npws.gov.ie](mailto:David.oconnor@npws.gov.ie)  
[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)

---

**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Thursday 12 December 2024 16:27  
**To:** David OConnor (Housing) <David.OConnor@npws.gov.ie>; Housing Referrals <Referrals@npws.gov.ie>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_50924

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Hi David,

Thank you for your reply.

I just want to clarify that this scoping request is for the Derryadd Substitute Consent Remedial Environmental Impact Assessment Report (rEIAR) and not the proposed Derryadd Wind Farm development, which is a separate consultation.

I have attached the relevant scoping letter sent 250924 in relation to this rEIAR.

A separate consultation was carried out by TOBIN in relation to the Derryadd Windfarm Project in Oct 2024.

Please let me know if you have any queries in relation to this.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>



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**From:** David OConnor (Housing) <[David.OConnor@npws.gov.ie](mailto:David.OConnor@npws.gov.ie)>  
**Sent:** Wednesday 11 December 2024 15:01  
**To:** Caroline Naughton <[caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)>  
**Subject:** Environmental Impact Assessment Report (rEIAR) Derryadd Wind Farm

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Good afternoon Caroline,

Please find attached Archaeological and Nature Conservation observations/recommendations for the above mentioned pre-planning application.

Please acknowledge receipt of the attached letter.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at:  
[referrals@npws.gov.ie](mailto:referrals@npws.gov.ie)

Kind regards,

**David O'Connor**  
*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*

**Oifigí an Rialtais**  
*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

---

[David.oconnor@npws.gov.ie](mailto:David.oconnor@npws.gov.ie)  
[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)

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## Caroline Naughton

---

**From:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>  
**Sent:** Wednesday 16 October 2024 09:27  
**To:** Caroline Naughton  
**Cc:** Ruth Fleming Dunne (Defence); Paul Farrell (Defence); Philomena Evans (Defence)  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** 2024-10-16 Response to Tobins - Derryadd Windfarm.pdf

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Dear Ms. Naughton,

In regard to your e-mail request below, dated 25<sup>th</sup> September 2024, please see the attached response from the Department of Defence.

Please contact me if you have any queries.

Best regards  
Don

**Don Watchorn**

*Property Management Branch*

**An Roinn Cosanta**

*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 452199

---

**From:** Defence Property Management Planning  
**Sent:** Thursday 26 September 2024 15:24  
**To:** 'caroline.naughton@tobin.ie' <caroline.naughton@tobin.ie>  
**Cc:** Gillian Holden (Defence) <Gillian.Holden@defence.ie>; Sarah Kelly (Defence) <Sarah.Kelly@defence.ie>; Don Watchorn (Defence) <Don.Watchorn@defence.ie>; Philomena Evans (Defence) <Philomena.Evans@defence.ie>; Bernie Tierney (Defence) <Bernie.Tierney@defence.ie>  
**Subject:** FW: Derryadd Substitute Consent rEIAR Scoping\_250924

Dear Ms. Naughton,

The Department of Defence wishes to acknowledge receipt of your email below re: the EIAR scoping request for the proposed Derryadd wind farm development.

We will consult with the relevant Military Authorities and we will revert in due course.

Kind Regards,  
Ruth

**Ruth Fleming-Dunne**

***Estate Management Branch – 1 Brigade***

**An Roinn Cosanta**

*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

—  
T +353 (0)45 452598

Email: [ruth.flemingdunne@defence.ie](mailto:ruth.flemingdunne@defence.ie)

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---

**From:** Caroline Naughton <[caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)>  
**Sent:** Wednesday 25 September 2024 16:04  
**To:** Defence Info <[info@defence.ie](mailto:info@defence.ie)>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**

## Senior Project Manager

TOBIN

Galway | Dublin | Castlebar | Limerick | Sligo

Telephone: +353 61 976262

Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)

Website: <http://www.tobin.ie>

# TOBIN



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Tobin  
Fairgreen House  
Fairgreen Road  
Galway  
H91 AX

16 October 2024

**Re: Application for Substitute Consent for peat extraction and all ancillary work**

**Without Prejudice**

Dear Ms. Naughton,

I write with regard to your letter dated 25<sup>th</sup> September 2024 relating to a Bord na Móna PLC application for Substitute Consent for peat extraction and all ancillary works. Undertaken within Derryadd, Derryaroge and Lough Bannow Bogs, Co. Longford at the site, known as Derryadd Windfarm

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.

As a matter of practice, the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

Having consulted with the Military authorities, the Department of Defence wishes to make the following observations:

- The Minister for Defence is responsible for the regulation of military aviation, whereas the Irish Aviation Authority (IAA) is responsible for the safety regulation of civil aviation including aerodromes. The IAA does not have remit for military aviation or installations. Safeguarding of military flight operations and installations is intended to protect both current and future aircraft operations



and also to take account of the security requirements associated with some of those operations.

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week.
- Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light
- Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) requirements.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the planning stage.

Please contact me if you have any queries in this regard.

Best regards  
Don

**Don Watchorn**

*Property Management Branch*

**An Roinn Cosanta**

*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 452199



**Your Ref: EIAR Scoping Document for the proposed Derryadd Wind Farm**

**Our Ref: G Pre Planning-LD-BnaM Wind Farm**

*(Please quote in all related correspondence)*

11 December 2024

Tobin Consulting Engineers  
Market Square  
Castlebar  
Co Mayo

**Development: Environmental Impact Assessment Report (rEIAR) for Wind Farm.  
Substitute Consent for historical peat extraction and all associated bog development  
works**

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

### **Nature Conservation**

The Department notes that the application site occurs within 3km of Lough Ree and the Lough Ree Special Protection Area (SPA). A number of qualifying interests of the Lough Ree SPA such as Whooper swan, Lapwing and Golden Plover are known to occur in the vicinity of the application site. Other important ornithological receptors such as the red listed Curlew and White-tailed Sea Eagle are also known to occur within the vicinity of the wind farm application site. Consequently, the Department wishes to emphasise the importance of establishing the presence or absence of any sensitive bird species that occur within the zone of influence of the proposed wind farm. The Department also wishes the importance of undertaking a robust assessment for any such species that considers the relevant potential impacts, such as collision mortality impacts, displacement impacts and/or disturbance impacts, which the proposed development may cause.

To facilitate the above the Department would like to make the following specific recommendations / observation for the consultant ecologists working on behalf of the applicant;



**A Visibility Analysis should be undertaken to inform the location and coverage the of vantage point surveys**

The Department considers that a visibility analysis should be undertaken to inform the placement of the vantage point surveys to ensure coverage of the wind farm application site its zone of influence. The area is characterised by large flat areas of cut over bogs in which a mosaic of wetlands, secondary woodland and scrub. Consequently, the department considers that any visibility analysis should be done on the basis of a Digital Surface Model (DSM) rather than a Digital Elevation Model (DEM) i.e. it should include the tree cover. This is necessary to ensure that areas of the site are not obstructed from view during the vantage point surveys. This is particularly important for species such as Golden plover and Lapwing, which are known to occur in the vicinity of the application site.

**Collision Risk Modelling / Collision Mortality Impacts should be contextualised appropriately**

The Ornithology Chapter of the EIAR should ensure that the correct reference population is used to contextualise any collision impacts predicted by the collision risk modelling for those species recorded within the collision zone of any turbines. In Ireland the methodology outlined in Percival (2003) to determine the significance of any collision mortality impacts is often referred to in EIARs provided with proposed windfarms. Percival (2003) states that 'one issue in this process concerns the precise area or bird population against which the degree of impact should be judged. For protected SPAs this is usually quite straightforward, comprising simply the populations for which that site has been designated' (Percival, 2003). Outside of protected sites Percival (2003) recommends that an analysis be undertaken as to whether a homogenous area of suitable habitat occurs with which a population may be associated and the density that this area may contain. In Scotland NatureScot recommends the use of Natural Heritage Zones (NHZs) which are bio-geographical units that represent areas with similar biogeographic character, similar habitat assemblages, and species populations. Any impact is first contextualised in terms of the populations of these areas before being contextualised nationally. These areas are not synonymous with administrative boundaries areas such as county boundaries. The use of such areas is particularly important when a population is distributed unevenly across the country or has a different distribution during the breeding season and the wintering season. As there is no published equivalent in Ireland to the Natural Heritage Zones (NHZs) used in Scotland efforts should be made by the consultants to create an appropriate reference bio-geographic area and associated population estimate, or make reference to appropriate published figures. Any estimate should be done with reference to scientific literature on the habitat requirements of the species and the population densities they typically hold during the relevant season.



### **Arbitrary / generic percentage thresholds should not be used to determine the significance of impacts**

The Department does not encourage the use of generic percentage thresholds when assessing the significance of the effects of any impacts caused by the proposed wind farm such as collision mortality impacts. Instead the Department recommends that the approach outlined in the guidance provided by the *Institute of Ecology and Environmental Management* (IEEM) which recommends that the ecology of the species, current status and trend be considered. The Department also encourages, where necessary, and where possible, that population modelling should be used to put any potential mortality impacts in context.

### **Cumulative effects should be considered in an additive manner**

The Department considers that the cumulative impacts of windfarms on bird species should be assessed with reference to the Nature Scot document *Assessing the cumulative impacts of onshore wind farms on birds* (2018). Most notably any collision mortality impacts, and/or displacement impacts, should be considered in an additive manner. Consequently any cumulative assessment should make reference to the additive annual collision mortality, or the additive displacement area, on any relevant species within the same bio-geographic area and not simply make reference to the conclusions of the relevant EIARs. This approach is necessary to ensure that a significant cumulative effect does not remain uncharacterised during the EIA process.

### **The interplay between the rehabilitation works and the proposed wind farm should be considered**

The proposed wind farm application site is subject to rehabilitation works being undertaken by *Bord na Mona* as part of their *Integrated Pollution Control* (IPC) licence. Consequently, rehabilitation works may occur before or concurrently with the development or operation of the proposed wind farm. As such the Department recommends that the effects, both positive and negative, that the rehabilitation works may have on the application site be considered in conjunction with the impacts of the proposed wind farm. For example, the application site may become more, or less, suitable for bird species that occur within the wider area. Any potential changes to the use of the application site by bird species over the course of the operation of the wind farm should be considered in any reports provided to inform the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) processes. The Department also recommends the inclusion of a robust post consent monitoring protocol that takes any such changes into account.

## **Archaeology**





It is noted that the proposed site boundary contains a very high concentration of recorded monument and any proposed development within this environment would require a full and detailed impact assessment report together with a full and detailed field survey. Where recorded archaeological monuments are located the NMS recommended avoidance.

Pending the results of a full and detailed impact assessment report together with a full and detailed field survey. The developer shall be prepared to be advised by the National Monuments Service with regard to any necessary mitigating action (e.g. redesign, preservation in situ) avoidance of all recorded monuments, further assessment such as geophysical survey, test trenching, monitoring and all groundwork and excavation.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [referrals@npws.gov.ie](mailto:referrals@npws.gov.ie), where used, or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

---

David O'Connor  
Development Applications Unit  
Administration



## Caroline Naughton

---

**From:** Caroline Naughton  
**Sent:** Tuesday 1 October 2024 15:58  
**To:** Defence Property Management Planning  
**Cc:** Gillian Holden (Defence); Sarah Kelly (Defence); Don Watchorn (Defence); Philomena Evans (Defence); Bernie Tierney (Defence)  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** 11400 Department of Defence Scoping 11.08.22.pdf

Hi Ruth,

Thank you for your reply.

I just want to clarify that this scoping request is for the Derryadd Substitute Consent Remedial Environmental Impact Assessment Report (rEIAR) and not the proposed Derryadd Wind Farm development, which is a separate consultation.

I have attached the relevant scoping letter sent 11.08.22 in relation to this rEIAR.

Please let me know if you have any queries in relation to this.

Kind regards,

**Caroline Naughton**  
**Senior Project Manager**

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>

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## Caroline Naughton

---

**From:** Wexford Receptionist <REC\_WEX@epa.ie>  
**Sent:** Wednesday 25 September 2024 16:20  
**To:** Caroline Naughton  
**Subject:** Re: Derryadd Substitute Consent rEIAR Scoping\_250924

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A Chara,

Your correspondence on 25/09/2024 has been forwarded for attention. Ta do chomhfhreagras 25/09/2024 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí

Joanne  
Duty Receptionist | Facility Management & Sustainability  
Office of Communications and Corporate Services, Wexford  
Fáilteoir ar Dualgas | Foireann Seirbhísí Eagraíochtúla  
An Oifig Cumarsáide agus Seirbhísí Corparáideacha, Loch Garman



053-9160600 (Direct dial)

[info@epa.ie](mailto:info@epa.ie)

[www.epa.ie](http://www.epa.ie)



---

**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Wednesday, September 25, 2024 16:05  
**To:** Wexford Receptionist <REC\_WEX@epa.ie>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
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## Caroline Naughton

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**Sent:** Wednesday 25 September 2024 16:20  
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A Chara,

Your correspondence on 25/09/2024 has been forwarded for attention. Ta do chomhfhreagras 25/09/2024 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí

Joanne  
Duty Receptionist | Facility Management & Sustainability  
Office of Communications and Corporate Services, Wexford  
Fáilteoir ar Dualgas | Foireann Seirbhísí Eagraíochtúla  
An Oifig Cumarsáide agus Seirbhísí Corparáideacha, Loch Garman



053-9160600 (Direct dial)

[info@epa.ie](mailto:info@epa.ie)

[www.epa.ie](http://www.epa.ie)



---

**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Wednesday, September 25, 2024 16:05  
**To:** Wexford Receptionist <REC\_WEX@epa.ie>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

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Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
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# TOBIN



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*2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation*  
*2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management*  
*2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*  
*2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*

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## Caroline Naughton

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**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Tuesday 15 October 2024 14:50  
**To:** Caroline Naughton  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** Fáilte Ireland EIAR Guidelines 2023.pdf

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Hello Caroline,

Thank you for your email regarding the Environmental Impact Assessment Report- Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

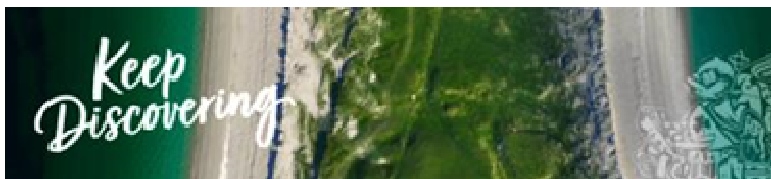
**Yvonne Jackson**

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**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Tuesday 1 October 2024 14:22  
**To:** planning applications <planning.applications@failteireland.ie>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
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# ELAR Guidelines for the Consideration of Tourism and Tourism Related Projects



**July 2023**

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## 1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

## 2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Ireland's role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

### **3. Legislation and Statutory Guidance**

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

#### ***Legislation***

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

#### ***Statutory Guidance***

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide 'An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects' to 'a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

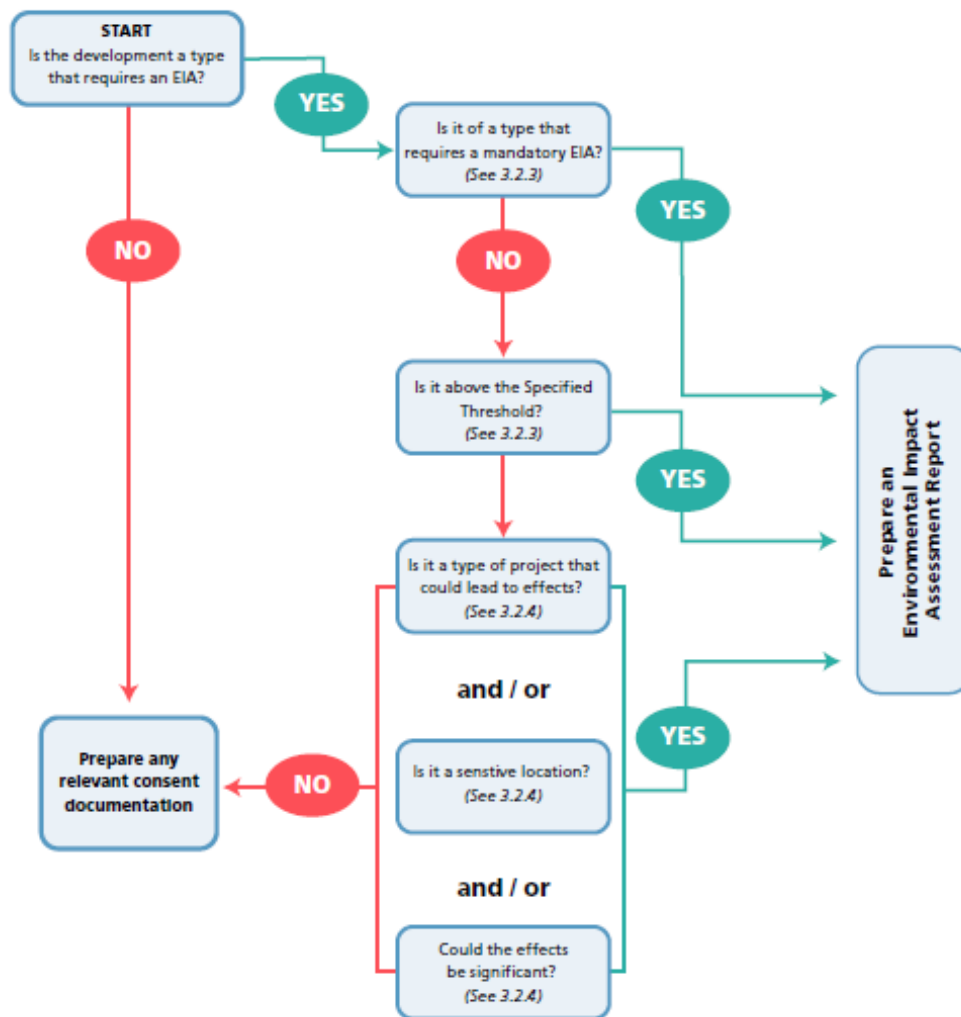
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

### **Screening**

Through EIA Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised above in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there may still be a requirement for an EIAR for that development (subject to EIA Screening assessment).



## *EIAR Scoping*

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

### **4. Assessing Tourism**

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*. This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

#### ***Projects which involve a tourism element***

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element can have potential for particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

#### ***Projects which may have an impact upon tourism***

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture

- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

## **5. Guiding Principles of EIAR**

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

## **6. Consideration of Competency and Qualifications**

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by '*competent experts*'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

## **7. EIAR Requirements**

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

### ***Project Description***

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

### ***Assessment of Alternatives***

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

### ***Baseline Assessment***

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context, Character, Significance, and Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

### ***Impact Assessment***

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

#### **Population and Human Health**

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity “..which may be relevant under ‘Population and Human Health’ and ‘Landscape’”.

#### **Biodiversity**

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are ‘unspoiled’ can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

*'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'*

#### Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

#### Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

#### Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

#### Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

#### Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

#### Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

#### Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

#### Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

#### Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

#### Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

#### ***Major Accident and Natural Disaster***

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

#### ***Interaction of Impacts***

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

#### ***Cumulative Impact***

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

### **Transboundary Impact**

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

### **Mitigation & Monitoring**

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy.

*Avoid* sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

*Reduce* the exposure of sensitive resources to excessive environmental impact.

*Reduce* the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

*Remedy* any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

*1. 'The decision to grant development consent shall incorporate at least the following information ...*

*(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'*

### **Residual Impacts**

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

## 8. Sources of information on Tourism

### ***Information available online***

#### *Fáilte Ireland*

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed [here](#). The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

#### *Discover Ireland:*

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed [here](#).

#### *Tourism Ireland*

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

#### *Local Authorities*

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

#### *Regional Assemblies*

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSESs) should be consulted.

#### *Central Statistics Office*

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.



## Caroline Naughton

---

**From:** Irish Peatland Conservation Council <bogs@ipcc.ie>  
**Sent:** Monday 14 October 2024 16:52  
**To:** Caroline Naughton  
**Subject:** Re: Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** SC\_rEIAR\_BnM\_IPCC Derryadd.pdf

**CAUTION:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR codes unless you recognise the sender and know the content is safe. Forward unusual emails to spam@tobin.ie for verification.

Dear Caroline,

Please see attached response from IPCC regarding the Substitute Consent Application for Derryadd/Bord na Móna.

Thank you and please confirm receipt for our records.

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology  
Conservation, Policy & Fundraising Officer  
Irish Peatland Conservation Council  
Lullymore  
Rathangan  
Co. Kildare  
R51 V293

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<https://scanner.topsec.com/?d=4369&r=auto&u=http%3A%2F%2Fwww.ipcc.ie&t=af10a7670892085de181aa5d04d7fd2b5c296e91> to learn all about the Save the Bogs Campaign or to arrange your visit to the Bog of Allen Nature Centre

On 25 Sep 2024, at 16:22, Caroline Naughton <caroline.naughton@tobin.ie> wrote:

Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 12.08.22, we are now issuing a renewed letter, and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**

Galway | Dublin | Castlebar | Limerick | Sligo

Telephone: +353 61 976262

Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)

Website: <http://www.tobin.ie>

<image001.png>      <image002.png>

***2022** Engineers Ireland Awards Winner: CPD Employer of the Year*

***2022** Association of Consulting Engineers of Ireland Awards Winner: Innovation*

***2020** Association of Consulting Engineers of Ireland Awards Winner: Project Management*

***2019** Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*

***2018** Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*

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# IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293

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**Caroline Naughton**  
**Senior Project Manager**  
**Tobin Consulting Engineers**  
**Block 10-4**  
**Blanchardstown**  
**Corporate Park**  
**Dublin D15 X98N**  
**caroline.naughton@tobin.ie**

**14<sup>th</sup> of October 2024**

**RE: Application for Substitute Consent for peat extraction and all ancillary works undertaken within Derryadd, Derryaroge and Lough Bannow Bogs, Co. Longford – Remedial EIA Scoping Consultation**

Dear Ms Naughton,

Thank you for including Irish Peatland Conservation Council as one of the consultees on the on this project. The Irish Peatland Conservation Council started the Save the Bogs Campaign 40 years ago to raise awareness of the disappearing peatland and the ecosystem services (flood regulation, biodiversity, tourism, carbon sequestration, natural and cultural heritage and amenity) being lost through habitat destruction and fragmentation. The peatland landscape of the midlands has been severely diminished through the industrial and domestic extraction of peat for energy and horticulture which has led to major consequences for the generations that have grown up without the opportunity of experiencing their natural heritage. In-fact Ireland is one of only two countries to officially announce a Climate and Biodiversity Emergency.

IPCC would like to make the following observation on this issue which I hope will provide some guidance for your application on behalf of Bord na Móna. IPCC have red line issues with regard to this assessment which are summarized in section 1 parts A-B below. Following this IPCC provide in [Section 2](#) accounts of specific issues and case studies relevant to this investigation.

## **Section 1 Red Line Issues**

### **1A) Bord na Móna Mandate**

From the very beginning in 1946 Bord na Móna were mandated to develop the peat bogs of Ireland and to provide an economy in the counties where their industry was located. It is true that the company have been successful in their endeavours, but the environmental cost has been high as the business of peat harvesting is not compatible with peatland conservation or valuing the ecosystem services that peatlands provide such as biodiversity, carbon storage and water regulation besides their use as a source of fuel. In addition, a recent research article in Nature, has shown that Ireland has lost more wetlands in the past 200 years than any other country globally. 90% of Ireland's wetlands has been lost in this time through intensive drainage and industrial production. (<https://www.theguardian.com/environment/2023/feb/08/world-wetlands-europe-lost-study-aoe>)

### **1B) Unregulated Loss of Valuable Habitat**

To lose 24% (almost 75,000ha) of the raised bog habitat of Ireland, the European headquarters for this habitat type, over the space of several decades is the evidence of the development spearheaded by Bord na Móna without proper regulation as we have learned from your letter, and this needs to be fully taken into account and mitigated for in your assessment. It is only in the last decade that Bord na Móna have moderated their values somewhat and have begun to actively engage in their own Peatland Restoration Programmes, initially with the intention of managing up to 4000ha or more of their restorable raised bog resource for conservation (see [Section 2E](#) below) including the designation of two site complexes as Special Areas of Conservation and three other sites as Natural Heritage Areas. This comes at a time when raised bog habitats are facing extinction across the country and is a very small contribution to the loss of biodiversity which the commercial activities of Bord na Móna have caused. While Bord na Móna are now at the end of peat extraction and have begun the Peatlands Climate Action Scheme,

## **40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE**

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláráithe in Éirinn: 116156

Registered Office/Oifig Cláráithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Miriam Mooney, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar

Patrons: Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ni Lamhna, Matthijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland, Kathrine Geoghegan Tina Claffey, Monty Don OBE.

we must not forget that the enhanced rehabilitation is only occurring because of the extra funding and not on all of the land holding, only 33,000ha. The rest of the areas only receive the standard rehabilitation and is not for the benefit of biodiversity or climate change regulation but for the stabilisation of the peat soils. It has been shown in reports such as the EPA's BOGLAND that these areas may not withstand the dryer summers and wetter winters predicted by climate change. They will return to being carbon emitters even with rehabilitation.

However IPCC have found from bitter experience that commitments made by this company can easily be forgotten by those working on the ground (see Clonroosk Little Case Study) and therefore it is important that commitments made as part of the Bord na Móna Biodiversity Plan are recognized and upheld in your assessment.

## Section 2 Specific Issues and Case Studies

### 2A - Loss of Peatland Habitat in Ireland Due to Commercial Peat Extraction

The pie charts attached in Figures 1 and 2 show the utilisation of raised and blanket bog habitat in Ireland since these ecosystems reached their maximum development. 24% of the raised bog habitat and 1% of blanket bog habitats have been drained and developed by Bord na Móna. The speed with which Bord na Móna have developed the raised and blanket bog resources (from 1946 to the present) as part of a Government Mandate set against the lack of a strong peatland conservation and protection policy led to the formation of the Irish Peatland Conservation Council. Since our formation in 1982 we have been campaigning for a balanced and wise-use approach to the conservation and utilisation of peatland resources. The campaign work has been difficult and it is

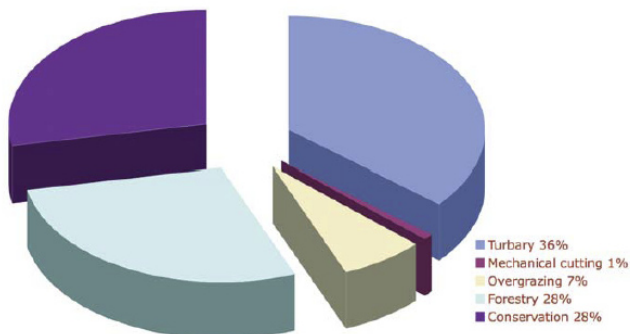


Figure 1: Utilisation of Blanket Bog habitat in the Republic of Ireland. The original area of blanket bog was 908,117ha according to Hammond 1979 and the pie chart is taken from Malone and O'Connell 2009.

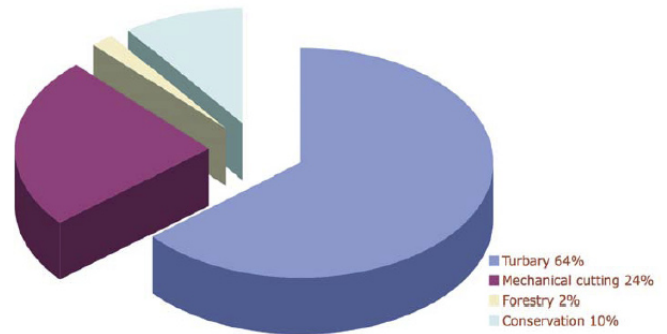


Figure 2: Utilisation of Raised Bog habitat in the Republic of Ireland. The original area of raised bog was 308,742ha according to Hammond 1979 and the pie chart is taken from Malone and O'Connell 2009. although the pie chart indicates that 10% of the habitat is of conservation importance, only 1% of the habitat is actively forming peat.

unfortunate, but today we are witnessing the almost total extinction of raised bog habitat.

According to the Raised Bog SAC Management Plan (2017) only 3,600ha of raised bog habitats (1% of the original area) are actively producing peat and to maintain this function requires significant intervention and costly restoration. However the work is necessary in terms of biodiversity, carbon storage and sequestration, water regulation and community well-being.

### 2B - Peatland policy of the Irish Peatland Conservation Council

The Irish Peatland Conservation Council's mission is to conserve a representative sample of the peatlands of Ireland for people to enjoy now and in the future. We are an environmental NGO formed in 1982 in response to the rapid destruction of peatland habitat due to industrialization. Our actions and policies are fully outlined in our sixth peatland action plan entitled Ireland's Peatland Conservation Action Plan 2020 – Halting the loss of biodiversity which can be read on line at [www.ipcc.ie](http://www.ipcc.ie). In 2021 IPCC also published an amendment, The Peatlands and Climate Change Action Plan 2030 which guides our campaigns and actions and highlights the importance of peatlands as catalysts for climate change mitigation and regulation through the practical demonstration of measuring carbon within an IPCC nature reserve and synthesising recent scientific research and legal implications. The legal basis for the IPCC's work is a collective responsibility to avoid the deterioration of natural habitats and species protected under the Birds and Habitats Directives. IPCC are a stakeholder on the Peatlands Council which was established by Government on the 7th April 2011. We have contributed to the development of the National Peatlands Strategy 2015, the Raised Bog SAC Management Plan 2017, a review of the use of peat in the horticulture industry (2020) and the Manual on Best Practice in relation to the restoration of raised bog habitats (2017) as part of our work with this body. We also work with the peatland industry through our representation on the International Peatland Society and the National Branch of this organization - the Irish Peatland Society. We contributed to the development of the Strategy for Responsible Peatland Management (2010 and 2019) developed by this group for its members.

### 2C - Case Studies: Peatland Conservation and the Bord na Móna Peat Industry

#### 2C.1 Pollagh Bog

The first direct conflict between conservation interests and Bord na Móna was raised by Prof John J. Moore S.J. in 1955 and concerned the proposed development of Pollagh Bog, Co. Offaly which was the only known location for the Rannoch Rush *Scheuchzeria palustris*. The plant was growing in an extensive and unique internal drainage soak feature of the bog. While Prof Moore made a case for the preservation of Pollagh Bog and this rare plant, his concerns were ignored and the bog was developed. Today it is the site of Lough Boora Parklands. An attempt to transfer the rush to Clara Bog soak failed.

### 2C.2 Clara Bog

Another conflict arose in the 1980's concerning Clara Bog, Co. Offaly. Over 400ha of this site was owned by Bord na Móna and the site was scheduled for development. While discussions were underway between nature conservation agencies and Bord na Móna, the machines were sent onto the Lough Roe soak side of the bog (Clara East) to install a network of drains. Subsequently the site was purchased from Bord na Móna by the National Parks and Wildlife Service. It was many years before drains were blocked and the soak natural drainage feature of the site has been irreparably damaged. This conflict brought the famous naturalist David Bellamy to Ireland who addressed public meetings on the dangers of losing this wonderful site and other peatland heritage.

### 2C.3 Cadamstown East and West (Derrinboy Bog)

Another site complex Cadamstown East and West also known as Derrinboy in Co. Offaly was surveyed by the National Parks and Wildlife Service in 1984 and found to be of scientific and conservation interest. This site was on the Bord na Móna agenda for development as an important moss peat/horticultural resource and it was subsequently developed in 1992 despite its scientific importance having been established 8 years previously (Foss and O'Connell 1996).

### 2C.4 Raised Bog 1990 Conservation Agreement

Another public conflict arose in 1990 from concern across Britain and Ireland about the use of moss peat in gardening. The gardening public were informed of the environmental impact and the destruction of raised bog habitat that the production of moss peat for gardening was having on wildlife, biodiversity, habitat and greenhouse gas emissions. This campaign run by the Peat Consortium (of which IPCC was a member together with other NGO's across the UK) had a significant impact on the sale of moss peat products produced by Bord na Móna in the UK. Bord na Móna could not prove that their horticultural product was coming from sites already in production when they owned a series of intact raised bogs that were designated for conservation (Areas of Scientific Interest) by the National Parks and Wildlife Service and which would very likely have been developed by this company. To save the value of their horticultural exports and to alleviate cash flow problems the company were experiencing at the time an agreement was reached between Bord na Móna, the National Parks and Wildlife Service and the European Union on the conservation of raised bogs in the ownership of Bord na Móna. The package involved the purchase from Bord na Móna of 2,518ha of lands in 20 sites across the country at a cost of £3.1M and their transfer to the National Parks and Wildlife Service. The EU provided 75% of the purchase cost of the sites under Habitats Directive financial instruments in place at the time (Foss and O'Connell 1996). The sites involved are presented in Table 1.

**Table 1: Peatlands transferred to the National Parks and Wildlife Service by Bord na Móna under the 1990 conservation agreement for which Bord na Móna received £3.1 million.**

Site Name	County	Area(ha)
All Saints	OY	112
Bellanagare	RN	400
Camderry/Boggauns	G	89
Carrowbehy	RN	184
Carownagappal	G	200
Castlefrench	G	35
Clooncullaun	G	53
Cloonkieran	RN	35
Corbo	RN	222
Crosswood	WH	33
Curraghlahanagh	G	160
Easkey/Gowlan	SO	500
Funshin	G	8
Keelagues/Lisnageeragh	G	179
Kilsallagh	G	12
Lough Lurgreen	G	31
Moorfield	G	25
Moyclare	OY	76
Shankill West	G	120
Trien	RN	44
<b>Total</b>	<b>20 Sites</b>	<b>2518ha</b>



Figure 3: Cloonroosk Bog County Kildare and Offaly - raised bog of conservation interest and the only site in County Kildare for *Sphagnum pulchrum*.



Figure 4: Air photograph of Cloonroosk bog showing drainage undertaken over the winter of 2013-2014.



Figure 5: Surface view of Cloonroosk bog showing drain and the disruption to the bog surface through the spraying of material from the drain onto the living peat forming moss layer.



## 2C.5 Cloonroosk Little and Mostrim Bog Ditching and Drainage

Between 2013 and 2018 three further sites were ditched and drained by Bord na Móna despite the company making commitments in the National Peatland Strategy (2015) concerning their intention not to open up any undrained bogs for peat production and their commitment as managers of significant tracts of peatlands on behalf of the Irish people to show leadership in responsible management, rehabilitation and restoration of peatlands. Table 2 shows the sites drained and ditched by Bord na Móna and discovered and brought to light by the Irish Peatland Conservation Council, An Taisce and the National Parks and Wildlife Service. The Cloonroosk Little Site already had a draft Rehabilitation Plan lodged with the EPA as part of the IPPC licensing process (Licence Ref. 502 of 2013) and the site being intact was in discussion in a National Parks and Wildlife Service review of Raised Bog Habitat in the country. As the development here exceeded 30ha, planning permission should surely have been required. The images presented in Figures 3, 4 and 5 show the damage done to this site. The ditching and drainage of Mostrim Bog carried out the first time in 2016 was discovered by An Taisce and was taken to court. The second time in 2018 the ditching was in contravention of the Wildlife Act which makes it illegal to remove habitat of nesting birds within the breeding season (1st March to 31st August). After discovery and publicity on all sites drain blocking was voluntarily undertaken by Bord na Móna as a mitigation for the damage to the natural hydrology of the raised bog sites and the damage to the peat forming species and habitats present within them and to birds of conservation concern including Curlew.

**Table 2: Sites Ditched and Drained by Bord na Móna (and subcontractors) from 2013 to 2018.**

**These sites have since been restored following discovery and investigation.**

Site Name, County	Area (ha)	Year of Damage	Notes
Cloonroosk Little Bog, OY	50	2013/2014	Only station for <i>Sphagnum pulchrum</i> in Kildare
Mostrim/Coolamber			
Cloonshannagh Bog, LD	41	2016	Breeding Curlew Site
Mostrim Bog, LD	11	2018	Breeding Curlew site

## 2D – Post Industrial Rehabilitation of Cutaway Bogs

While IPCC agree with the list of peat extraction activities you document in your letter we would also add that a key element of the extraction which you have omitted and which is a requirement of EPA license is the rehabilitation of sites following the removal of the commercially viable peat from the individual bog units. In the company's Biodiversity Action Plan 2016-2021, it states that 15% of their estate area has been rehabilitated or restored. The Peatland Climate Action Scheme has also been initiated and preliminary enhanced rehabilitation works have been completed on some bogs. This activity needs to be included in your assessment of Bord na Móna activities. In relation to rehabilitation, IPCC, take a strong interest as we are consulted by Bord na Móna on their draft Rehabilitation Plans developed under license for sites coming out of production. For example from 2018 to 2019 we have been consulted by the Bord on the rehabilitation plans for the following sites:

Edera Bog, Longford  
Newtown/Loughgore, Co. Galway  
Attymon and Clonkeen Bogs, Co. Galway  
Ballysorrell Bog, Co. Tipperary  
Littleton Bog Complex, Co. Tipperary

Since the announcement of PCAS IPCC has also contributed our comments on many of the enhanced rehabilitation plans.

Cavemount Bog, Clonad Bog, Derries Bog, Turraun Bog, Lodge Bog, Belmont Bog, Boora Bog, Castlegar Bog, Cloonif Bog, Derrycashel Bog, DerryColumb Bog, Esker Bog, Garrydub Bog, Kellysgrove Bog, Kilmacshane Bog, Mount Lucas Bog, Oughter Bog, Pollagh Bog, Umeras Bog, Blackwater Bog

We made detailed submissions to all of these documents on the following issues:

- proposed protection and management of deep peat bog remnants remaining within the rehabilitation sites
- the need for landscaping and profiling of sites following industrial abandonment so that drain blocking can substantially rewet the remaining peat area to prevent emissions of greenhouse gases from bare dry peat (currently the maximum level of rewetting that Bord na Móna can achieve is <20% of a bog unit area with very little intervention). The Bord have been too reliant on natural recolonisation of Scrub Birch Woodland and Rushes to stabilise their peat.
- the need to practice targeted management for biodiversity re-establishing on these sites
- the need to provide capital from the company's profits to fund rehabilitation works
- the need to undertake monitoring of successes and failures
- the need to publish for peer review the rehabilitation methods being used on industrial cutaway bogs
- the issue of surrounding important restoration sites within PCAS with renewable energy developments or other developments
- Dissolved Organic Carbon, Ammonia and Greenhouse Gas Emissions, impact of Nitrogen deposition on rehabilitated and restored sites.

In light of the current review IPCC would like to see rehabilitation actions proposed for industrial sites being brought under planning control.

## 2E – Bord na Móna Raised Bog Restoration Programme

IPCC have also been engaging with the Bord na Móna raised bog restoration programme (2009 to the present) which involves management of a number of sites across the Bord na Móna estate for nature conservation (see Figure 6 sourced from a talk given by Barry O'Loughlin 2018 for examples). The sites include two complexes earmarked for designation as Special Areas of Conservation

and three other sites to be designated as Natural Heritage Areas. These sites were proposed for conservation following extensive baseline surveys by the company ecology team between 2009 and 2012. These sites although partially drained in the 1980's were identified by the company as having high ecological and conservation value as well as significant restoration potential. Other sites ditched and drained by the Bord have also been included in the programme such as Mostrim Bog in Co. Longford. The target area for

Year of Restoration	Bog Name	County	High Bog Area (ha)	Total Site Area (ha)
2009	Abbeyfeix Bog	Laois	104	190
2011	Cuckoo Hill Bog	Roscommon	60	145
2012	Moyarwood Bog	Galway	171	197
2013	Ballydangan Bog	Roscommon	215	240
2014	Lenareagh Bog	Galway	90	112
2014	Paul's Lough Bog	Galway	118	132
2014	Cloonshannagh Bog	Roscommon	36	36
2015	Mostrim Bog (Phase 1)	Longford	41	41
2015	Cranberry Lough Bog	Roscommon	76	98
2015	Knock Bog	Roscommon	129	187
2016	Bunahinly remnant	Westmeath	28	393
2016	Clera Island	Roscommon	157	179
2016	*Bracklin remnant	Westmeath	19	755*
2016	Clynan Bog (Phase 1)	Westmeath	10	10
2017	*Lough Bannow remnant	Longford	33	758*
2017	*Clongawny More remnant	Offaly	27	1021*
2017	*Daingean-Rathdrum remnant	Offaly	26	368*
2017	Coolnagun remnant	Westmeath	90	670
2018	Ballysorrel	Tipperary	167	196
Total Area			1597	5728
Total restored to date			1597	
started				
2016 +	Killelglan Bog cluster	Roscommon	334	440
	Mostrim Bog (Phase 2)**	Longford/Westmeath	358	398
	Clynan Bog (Phase 2)**	Longford/Westmeath	63	63
	Clonwhelan Bog	Longford/Westmeath	132	162
	Glenlough Bog**	Longford/Westmeath	262	329
	Knockahaw Bog	Tipperary/Kilkenny	312	372
	*Cornaveagh remnant	Roscommon	21	91
	*Glashabaun North remnant	Offaly	16	508
	Tinur-Derrymore Bog Cluster	Galway	245	445
	*Lismanny remnant	Galway	15	15
	Newtown-Loughgore	Galway	340	454
	Lisclogher West Bog	Westmeath	164	239
	Kellysgrove Bog	Galway	118	192
	Total Area		2317	3645
	Total (overall)		3914 ha	9436 ha*

Figure 6: Table of Sites Involved in the Bord na Móna Raised Bog Restoration Programme.

This information was sourced from O'Loughlin 2018 at <http://www.bordnamona.ie/wp-content/uploads/2018/05/Barry-oloughlin-Bog-restoration-and-curlew-Projects.pdf>.

this programme is between 2000 and 4000ha (see Figure 6). This work is one strand of the company's Biodiversity Action Plan 2016-2021. Such sites are generally regarded as surplus to peat production requirements and lie outside the active industrial peat production areas.

By 2018 1597ha of land has been restored and it is expected to add another 2317ha to that going forward as shown in this table. Please note some sites that have been restored are not presented in this table notably clonroosk little, cos. Kildare and Offaly.

#### Bord na Móna sites proposed for SAC Designation

Clonboley Complex (including Ballydangan Bog) Roscommon

Killelglan Bog Cluster Roscommon

#### Bord na Móna sites proposed for NHA Designation

Glenlough Bog Longford/Westmeath

Clonwhelan Bog Longford/Westmeath

Knockahaw Bog Tipperary/Kilkenny

The restoration works carried out by Bord na Móna has led to a strong consultancy business within the company who have been involved in blocking drains on conservation-worthy sites owned by the National Parks and Wildlife Service. The company won a contract in 2020 to the value of €5 million from the Department of Culture, Heritage and the Gaeltacht to carry out restoration works on a selection of the country's network of raised bogs of conservation value (including SAC- and NHA-designated sites).

Thank you for reading through our concerns and please acknowledge receipt of this submission.

Your Sincerely,

*Tristram Whyte*

Tristram Whyte - Conservation, Policy & Fundraising Officer  
Irish Peatland Conservation Council

## References

Ireland's Peatland Conservation Action Plan 2020, Malone S and O'Connell 2009, IPCC, Kildare. [www.ipcc.ie](http://www.ipcc.ie).

Irish Peatland Conservation Plan 2000, Foss, P J and O'Connell, 1996 IPCC, Dublin

Peatlands and Climate Change Action Plan 2030, O'Connell, Madigan, Farrell, Whyte, IPCC, Kildare, [www.ipcc.ie](http://www.ipcc.ie).

Irish Peatland Conservation Council submission on Peat in the horticultural industry review <http://www.ipcc.ie/wp/wpcontent/uploads/2017/08/IPCC-Peat-in-the-Horticultural-Industry-Review-2020.pdf>



## Caroline Naughton

---

**From:** INFO <Information@tii.ie>  
**Sent:** Wednesday 9 October 2024 15:30  
**To:** Caroline Naughton  
**Subject:** TII24-128879 - rEIAR Scoping response in relation to the proposed historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs, Co. Longford on behalf of Bord na Móna.

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A Chara,

Thank you for your correspondence of 25 September 2024 in relation to the above. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants with respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official national road and light rail policy and guidelines including Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and TII Publications.

Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

TII notes the stated intention that the remedial EIAR (rEIAR) to be prepared is for a substitute consent application for historic peat extraction to precede a future application for a wind farm development. TII made a previous rEIAR scoping response in September 2022 under TII ref. TII22-119905 for the project site noting that it traversed the N63 national secondary road at a location with the 100 km/h speed limit applies. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 km/h apply. Therefore, there are policy and road safety considerations that are required to be considered in any subsequent application, therefore alternative arrangements may need to be considered.

With respect to rEIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network. The project promoter should have regard, inter alia, to the following:

Having regard to the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports, 2022 it is recommended as appropriate that the national road and light rail networks be recognised as strategic transport assets under "material assets". EIAR assessment and mitigation should have regard to the following:

- **National Roads:** Official policy for development at or near national roads is set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) available at <https://www.gov.ie/en/collection/85b83-planning-guidelines-standards/>.
- **TII Publications:** In addition, as part of TII's responsibilities for managing and improving the country's national road and light rail networks, TII sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>.

In addition, the EIAR should have regard to, inter alia, the following:

#### **National Road Network:**

- TII would be specifically concerned with the potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development,
- TII notes that the subject site adjoins the N63, national secondary road. Therefore, there are official policy and road safety considerations that would need to be resolved in relation to access to national roads as outlined above,
- Consultations should be had with the relevant Local Authority/National Roads Design Office (RDO) with regard to locations of existing and future national road schemes,
- The EIAR should have regard to any prior Environmental Impact Statement or Assessment Report and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard for any potential cumulative impacts,
- The EIAR should have regard to the provisions of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in the assessment.

#### **TII Publications:**

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (TII Publication No. PE-PDV-02045) should be referred to in relation to the proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the Guidelines which addresses requirements for sub-threshold TTA,
- The designers and assessors are asked to consult TII Publications to determine whether a Road Safety Audit is required.

#### **TII environmental assessment guidance:**

- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (March 2014),
- The EIAR should consider the European Communities (Environmental Noise) Regulations 2018 (S.I. No. 549 of 2018) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (March 2014)).

**Haul routes utilising the national road network:**

- Elements of the national road network are operated and managed by a combination of Public Private Partnership (PPP) Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed to ascertain any operational requirements, including delivery timetabling, etc. to ensure that the strategic function of the national road network is safeguarded,
- Separate structure approvals/permits and other licences and works-specific deeds of indemnity may be required in connection with the proposed haul route, including where temporary modification to the road network may be required. Consultation with relevant local authorities, PPP and MMaRC may also be required,
- All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed, including abnormal weight load. Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal loads (e.g. tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

**National Road Crossings:**

- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network,
- The preferred method of necessary national road network crossings is horizontal directional drilling (HDD). It is appropriate for the designers to contact [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in order to coordinate and process approvals for this type of crossing that may include requirements for Section 53 consent and specific indemnities for the works.

**Potential future cable routing:**

Any grid connection and cable routing proposals should be developed to safeguard existing national roads and/or proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national roads network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

There are around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approximately 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including:

- Impacts on embankments, bridges, drainage and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impacts on network traffic flows during installation,
- Impediment to future online upgrades of national roads because of the implications to road authority / TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation, including the construction of associated joint bays, have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high-voltage cabling within the national road reservation.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'.

Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public roads, where appropriate to demonstrate clearly that the 'optimal solution' in accordance with CAP 24 requirements is proposed in the subject application. In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development-specific issues should be addressed in accordance with best practice.

I hope this information is of assistance to you.

**Mise le meas,**

**Rachel Begley**  
**Regulatory & Administration Executive**



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Próiseálann BIE sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag

<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.tii.ie%2Fabout%2Fabout-tii%2FData-Protection%2F%3Fset-lang%3Dga&t=1bed96c524b25db2ed35183935ca047dda63171b>

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## Caroline Naughton

---

**From:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Sent:** Wednesday 2 October 2024 11:35  
**To:** Caroline Naughton  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924

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Thanks Caroline.

---

**Liam Hawkes**

*Central Policy, Coordination & Reform Division*

---

**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Tuesday, October 1, 2024 1:44 PM  
**To:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924

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Hi Liam,

Thank you for your reply.

The letter you have attached is for the Derryadd Wind Farm EIAR. This scoping request is for the Derryadd Substitute Consent Remedial Environmental Impact Assessment Report (rEIAR). I have attached the relevant scoping letter sent 11.08.22 in relation to this.

Please let me know if you have any further queries.

Kind regards,

**Caroline Naughton**  
**Senior Project Manager**

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>

## Caroline Naughton

---

**From:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Sent:** Monday 30 September 2024 13:09  
**To:** Caroline Naughton  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** 14 Department of Transport.pdf; 11399 Derryadd EIA Revised Scoping Report- Wind Farm \_D03\_Issue\_Consultees.pdf

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Hi Caroline,

I just wanted to confirm whether the attached letter is the one you are referring to from 2022? The dates don't line up exactly as you'll see.

Best wishes,

Liam

---

**Liam Hawkes**

*Central Policy, Coordination & Reform Division*

---

**An Roinn Iompair**

*Department of Transport*

**Lána Líosain, Baile Átha Cliath, D02 TR60**

Leeson Lane, Dublin, D02 TR60

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**From:** Caroline Naughton <[caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)>

**Sent:** Wednesday, September 25, 2024 4:03 PM

**To:** Transport Department of Transport <[info@transport.gov.ie](mailto:info@transport.gov.ie)>

**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>



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*2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*  
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## Caroline Naughton

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**From:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>  
**Sent:** Thursday 26 September 2024 15:24  
**To:** Caroline Naughton  
**Cc:** Gillian Holden (Defence); Sarah Kelly (Defence); Don Watchorn (Defence); Philomena Evans (Defence); Bernie Tierney (Defence)  
**Subject:** FW: Derryadd Substitute Consent rEIAR Scoping\_250924  
**Attachments:** Derryadd Substitute Consent rEIAR Scoping\_250924 (10).pdf

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Dear Ms. Naughton,

The Department of Defence wishes to acknowledge receipt of your email below re: the EIAR scoping request for the proposed Derryadd wind farm development.

We will consult with the relevant Military Authorities and we will revert in due course.

Kind Regards,  
Ruth

**Ruth Fleming-Dunne**

*Estate Management Branch – 1 Brigade*

**An Roinn Cosanta**

*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**

Station Road, Newbridge, Co.Kildare, W12 AD93.

—  
T +353 (0)45 452598

Email: ruth.flemingdunne@defence.ie

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**From:** Caroline Naughton <[caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)>  
**Sent:** Wednesday 25 September 2024 16:04  
**To:** Defence Info <[info@defence.ie](mailto:info@defence.ie)>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
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seolta chucu a bhaineann siad agus ní ceart iad a léamh ná a scaoileadh chuig aon tríú páirtí gan cead roimh ré ón Roinn Cosanta.

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## Caroline Naughton

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**From:** Contact Us <contactus@hsa.ie>  
**Sent:** Thursday 26 September 2024 14:19  
**To:** Caroline Naughton  
**Subject:** FW: Derryadd Substitute Consent rEIAR Scoping\_250924

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**From:** Land Use Planning <LandUsePlanning@hsa.ie>  
**Sent:** Thursday 26 September 2024 11:47  
**To:** Contact Us <contactus@hsa.ie>  
**Subject:** RE: Derryadd Substitute Consent rEIAR Scoping\_250924

Hello Caroline,

Thank you for your email. The Health and Safety Authority does not have any comments or observations to make on this application.

Kind Regards,

Tara Horigan

---

**From:** Caroline Naughton <[caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)>  
**Sent:** Wednesday 25 September 2024 16:37  
**To:** Contact Us <[contactus@hsa.ie](mailto:contactus@hsa.ie)>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 12.08.22, we are now issuing a renewed letter, and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,  
Caroline Naughton  
Senior Project Manager

TOBIN  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
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## Caroline Naughton

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**From:** Jonathan Stirland (Housing) <Jonathan.Stirland@housing.gov.ie>  
**Sent:** Thursday 26 September 2024 10:25  
**To:** Caroline Naughton  
**Subject:** Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford

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Date: 26/09/2024

Our Reference; LCON-A240926-0014

Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford

Re: Environmental Impact Assessment Report (rEIAR) for Wind Farm. Substitute Consent for historical peat extraction and all associated bog development works.

Dear Caroline Naughton

Thank you for your request for consultation Re: the proposed development of an Environmental Impact Assessment Report (rEIAR) for Wind Farm at Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford.

It is noted that the proposed site boundary contains a very high concentration of recorded monuments and that any proposed development within this environment would require a full and detailed archaeological impact assessment report together with a full and detailed field survey. Where recorded archaeological monuments are located the NMS recommended avoidance.

Pending the results of a full and detailed impact assessment report together with a full and detailed field survey. The developer shall be prepared to be advised by the National Monuments Service with regard to any necessary mitigating action (e.g. redesign, preservation in situ /avoidance of all recorded monuments, and further assessment such as geophysical survey , test trenching, monitoring and all groundworks.

Kind Regards  
Jon

**Jon Stirland**

Seandálaí - Archaeologist  
Seirbhís Séadchomharthaí Náisiúnta - National Monuments Service

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht**  
Department of Housing, Local Government and Heritage  
Teach an Chustaim, Baile Átha Cliath 1, D01 W6X0  
Custom House, Dublin 1, D01 W6X0

M +353 (0) 85 747 9528  
T +353 (0)1

Email: [Jonathan.Stirland@housing.gov.ie](mailto:Jonathan.Stirland@housing.gov.ie)

## Caroline Naughton

---

**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Thursday 26 September 2024 09:04  
**To:** Caroline Naughton  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

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Good morning Caroline

I acknowledge receipt of your recent consultation.

Please note that the Development Applications Unit (DAU) is the co-ordinating unit for the Department of Housing, Local Government and Heritage, co-ordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, the Underwater Archaeology Unit and Architectural Heritage.

All Correspondence in relation to preplanning consultations is to be issued to Development Applications Unit.

In the event of observations, you will receive a co-ordinated heritage-related response by email from the Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie).

Kind Regards

David

**David O'Connor**  
*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**  
Newtown Road, Wexford, County Wexford, Y35 AP90

—  
[David.oconnor@npws.gov.ie](mailto:David.oconnor@npws.gov.ie)  
[Manager.DAU@npws.gov.ie](mailto:Manager.DAU@npws.gov.ie)

## Caroline Naughton

---

**From:** Info @ Waterways Ireland <info@waterwaysireland.org>  
**Sent:** Wednesday 25 September 2024 16:42  
**To:** Caroline Naughton  
**Subject:** Automatic reply: Derryadd Substitute Consent rEIAR Scoping\_250924

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Thank you for contacting Waterways Ireland. Please accept this as an acknowledgement that your email has been received. Your email will be forwarded onto the relevant service area for its attention. If your email requires a response, we will endeavour to come back to you as quickly as possible.

For media enquiries please contact corporate@waterwaysireland.org<mailto:corporate@waterwaysireland.org>  
To report an emergency, please call 01 224 8204

If you wish to report an issue with our infrastructure or facilities please report it here<<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.waterwaysireland.org%2Freport%2Fnavigation-problem&t=d4bedf0e41d07729c22c934e1dec9da81501947e>>.

If you are unhappy with a service, facility or staff behaviour and wish to make a complaint<<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.waterwaysireland.org%2Freport%2Fcompliments-and-complaints&t=e8babda597c02399331a31a9cdddaa951eb05b18>> please use this link to see the customer complaint guidelines and an online form.

Go raibh maith agat as dul i dteagmháil le hUiscebhealaí Éireann. Iarrtar ort é seo a ghlacadh mar admháil go bhfuarthas do ríomhphost. Cuirfear do ríomhphost ar aghaidh chuig an ionad seirbhíse chuí dá n-aire air. Má tá freagairt ar do ríomhphost de dhíth, déanfaidh muid iarracht dul ar ais chugat a luaithe agus is féidir.

Le haghaidh fiosruithe ó na meáin, déan teagmháil le corporate@waterwaysireland.org<mailto:corporate@waterwaysireland.org>  
Chun éigeandáil a thuairisciú, cuir glaoch ar 01 224 8204'

Más maith leat fadhb a thuairisciú maidir lenár mbonneagar nó ár n-áiseanna, iarrtar ort sin a thuairisciú anseo<<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.waterwaysireland.org%2Freport%2Fnavigation-problem&t=d4bedf0e41d07729c22c934e1dec9da81501947e>>.

Más rud é nach bhfuil tú sásta le seirbhís, áis nó iompraíocht na foirne agus gur mhaith leat gearán a dhéanamh<<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.waterwaysireland.org%2Freport%2Fcompliments-and-complaints&t=e8babda597c02399331a31a9cdddaa951eb05b18>>, iarrtar ort an nasc seo a úsáid chun féachaint ar na treoracha chun gearáin a dhéanamh agus ar an fhoirm ar líne.



## Caroline Naughton

---

**From:** PR <info@coillte.ie>  
**Sent:** Wednesday 25 September 2024 16:22  
**To:** Caroline Naughton  
**Subject:** Stakeholder Consultation Team

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Dear Stakeholder,

Thank you for your e-mail. It will be forwarded to the relevant person/team in Coillte for review and response.

We appreciate your contact and will come back to you as soon as we can.

Kind regards,

Stakeholder Consultation Team  
-----

Geallsealbhóir a chara,

Go raibh maith agat as do r-phost. Cuirfear ar aghaidh chuig an duine / foireann ábhartha i Coillte agus é le haghaidh athbhreithnithe agus freagartha.

Táimid buíoch as do theagmháil agus tiocfaimid ar ais chugat comh luaithe agus is féidir linn.

Is mise le meas,

An Fhoireann Chomhairliúcháin le Páirtithe Leasmhara

*As a valued contact, Coillte is committed to protecting your privacy. We have updated our Privacy Policy which provides information on how we protect and use personal data. For further information please access the policy here <https://www.coillte.ie/privacy-policy/>*

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## Caroline Naughton

---

**From:** Wexford Receptionist <REC\_WEX@epa.ie>  
**Sent:** Wednesday 25 September 2024 16:20  
**To:** Caroline Naughton  
**Subject:** Re: Derryadd Substitute Consent rEIAR Scoping\_250924

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A Chara,

Your correspondence on 25/09/2024 has been forwarded for attention. Ta do chomhfhreagras 25/09/2024 seolta ar aghaidh le haghaidh aird.

Le gach dea-ghuí

Joanne  
Duty Receptionist | Facility Management & Sustainability  
Office of Communications and Corporate Services, Wexford  
Fáilteoir ar Dualgas | Foireann Seirbhísí Eagraíochtúla  
An Oifig Cumarsáide agus Seirbhísí Corparáideacha, Loch Garman



053-9160600 (Direct dial)

[info@epa.ie](mailto:info@epa.ie)

[www.epa.ie](http://www.epa.ie)



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**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Wednesday, September 25, 2024 16:05  
**To:** Wexford Receptionist <REC\_WEX@epa.ie>  
**Subject:** Derryadd Substitute Consent rEIAR Scoping\_250924

Dear Sir/Madam,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application.

Following our initial scoping letter sent on the 11.08.22, we are now issuing a renewed letter and we are inviting comments or observations from all relevant stakeholders.

Please see details in the attached scoping letter. If you have any queries on the attached, please contact me on the below details.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>

# TOBIN



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*2022 Association of Consulting Engineers of Ireland Awards Winner: Innovation*  
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*2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*  
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## Caroline Naughton

---

**From:** PR <info@coillte.ie>  
**Sent:** Wednesday 25 September 2024 16:20  
**To:** Caroline Naughton  
**Subject:** Stakeholder Consultation Team

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Dear Stakeholder,

Thank you for your e-mail. It will be forwarded to the relevant person/team in Coillte for review and response.

We appreciate your contact and will come back to you as soon as we can.

Kind regards,

Stakeholder Consultation Team  
-----

Geallsealbhóir a chara,

Go raibh maith agat as do r-phost. Cuirfear ar aghaidh chuig an duine / foireann ábhartha i Coillte agus é le haghaidh athbhreithnithe agus freagartha.

Táimid buíoch as do theagmháil agus tiocfaimid ar ais chugat comh luaithe agus is féidir linn.

Is mise le meas,

An Fhoireann Chomhairliúcháin le Páirtithe Leasmhara

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## Caroline Naughton

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**From:** INFO <Information@tii.ie>  
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**A Chara,**

Admhaíonn Bonneagar Iompair Éireann go bhfuarthas do ríomhphost.

Eiseofar freagra ar d'fhiosrúchán in am trátha.

**Le gach dea-mhéin,**

**An tAonad Rialála agus Riaracháin  
Bonneagar Iompair Éireann**

TABHAIR FAOI DEARA: Ní sheiceálfar freagraí ar ríomhphoist admhála. Ba cheart ríomhphoist a sheoladh go díreach chuig [info@tii.ie](mailto:info@tii.ie)



**Dear Sir/Madam,**

Transport Infrastructure Ireland acknowledges receipt of your email.

A response to your enquiry will issue in due course.

**Kind regards,**

**Regulatory and Administration Unit  
Transport Infrastructure Ireland**

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## Caroline Naughton

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**To:** Caroline Naughton  
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**A Chara,**

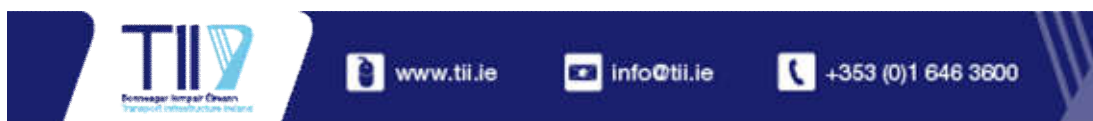
Admhaíonn Bonneagar Iompair Éireann go bhfuarthas do ríomhphost.

Eiseofar freagra ar d'fhiosrúchán in am trátha.

**Le gach dea-mhéin,**

**An tAonad Rialála agus Riaracháin  
Bonneagar Iompair Éireann**

TABHAIR FAOI DEARA: Ní sheiceálfar freagraí ar ríomhphoist admhála. Ba cheart ríomhphoist a sheoladh go díreach chuig [info@tii.ie](mailto:info@tii.ie)



**Dear Sir/Madam,**

Transport Infrastructure Ireland acknowledges receipt of your email.

A response to your enquiry will issue in due course.

**Kind regards,**

**Regulatory and Administration Unit  
Transport Infrastructure Ireland**



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tii%2FData-Protection%2F%3Fset-lang%3Dga&t=1bed96c524b25db2ed35183935ca047dda63171b

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## Caroline Naughton

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**From:** INFO <Information@tii.ie>  
**Sent:** Wednesday 25 September 2024 16:18  
**To:** Caroline Naughton  
**Subject:** Automatic reply: Derryadd Substitute Consent rEIAR Scoping\_250924

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Eiseofar freagra ar d'fhiosrúchán in am trátha.

Le gach dea-mhéin,

An tAonad Rialála agus Riaracháin  
Bonneagar Iompair Éireann

Dear Sir/Madam,

Transport Infrastructure Ireland acknowledges receipt of your email.

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Kind regards,

Regulatory and Administration Unit  
Transport Infrastructure Ireland

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar

fáil ag

<https://scanner.topsec.com/?d=4369&r=auto&u=https%3A%2F%2Fwww.tii.ie%2Fabout%2Fabout-tii%2FData-Protection%2F%3Fset-lang%3Dga&t=1bed96c524b25db2ed35183935ca047dda63171b>

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## Caroline Naughton

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**From:** Transport Department of Transport <info@transport.gov.ie>  
**Sent:** Wednesday 25 September 2024 16:03  
**To:** Caroline Naughton  
**Subject:** Automatic reply: Derryadd Substitute Consent rEIAR Scoping\_250924

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THIS IS AN AUTOMATIC ACKNOWLEDGEMENT OF RECEIPT OF YOUR EMAIL. PLEASE *DO NOT REPLY TO THIS EMAIL AS REPLIES TO AUTO ACKNOWLEDGEMENTS WILL REMAIN UNANSWERED.*

Dear Customer,

Thank you for contacting The Department of Transport Customer Services Unit.

We have received your message and the division or staff member that is dealing with your query will provide a full reply within 20 working days in the majority of cases.

In the meantime if you need an answer sooner, you can find answers to most queries on our website, [www.gov.ie/transport](http://www.gov.ie/transport)

Regards,

Customer Services  
Department of Transport

Is seo uath-admháil go bhfuarthas do ríomhphoist. Ná freagraíonn leis an roimhphoist seo más é do thoil é mar fanfaidh freagraí leis na uath-admhálacha gan freagairt.

Chustaiméir, a chara,

Go raibh maith agat as teagmháil a dhéanamh leis an t-aonad um Sheirbhísí do Chustaiméirí sa Roinn Iompair.

Tá do theachtaireacht faighte againn agus beidh an rannán nó don bhall foirne a bheidh ag déileáil le do cheist ag cur freagra iomlán ar fáil laistigh de 20 lá oibre i bhformhór na gcásanna.

Idir an dá linn más gá duit freagra a fháil níos túisce, is féidir leat freagraí den chuid is mó de na ceisteanna a fháil ar ár suíomh gréasáin, [www.gov.ie/transport](http://www.gov.ie/transport)

Le meas,

Seirbhísí Custaiméirí

An Roinn Iompair

\*\*\*\*\*

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar [www.gov.ie/transport](http://www.gov.ie/transport)

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\*\*\*\*\*

## Caroline Naughton

---

**From:** Environment General <environment@longfordcoco.ie>  
**Sent:** Wednesday 25 September 2024 15:39  
**To:** Caroline Naughton  
**Subject:** Acknowledgement from Environment

**CAUTION:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR codes unless you recognise the sender and know the content is safe. Forward unusual emails to spam@tobin.ie for verification.

Dear Caroline Naughton,

I wish to acknowledge receipt of your email to the Environment section which will be assigned to the relevant member of staff for their attention.

Deimhním leis seo go bhfuil an ríomhphost a sheol tú chuig an rannóg Comhshaoil faighte againn. Cuirfear faoi bhráid an duine chuí é agus déileálfar leis ansin.

Regards/Le gach dea-ghuí/  
Longford County Council Environment Section

*The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal and professional privilege. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it. If you have received this email in error, please notify the sender immediately and delete all copies of this email from your computer system(s). Unauthorised disclosure or communication or other use of the contents of this e-mail or any part thereof may be prohibited by law and may constitute a criminal offence.*

*Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltán leis, faoi phribhléid agus faoi rún agus le h-agmaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid proifisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scríos an t-ábhar ó do ríomhaire le do thoil.*

## Caroline Naughton

---

**From:** Housing Qcsofficer <qcsofficer@housing.gov.ie>  
**Sent:** Wednesday 25 September 2024 15:17  
**To:** Caroline Naughton  
**Subject:** Automatic reply: Derryadd Substitute Consent rEIAR Scoping\_250924

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A Chara

Thank you for your email to the Quality Customer Service mailbox of the Department of Housing, Local Government and Heritage. We will examine your query and endeavour to resolve it within 15 working days, in accordance with our Customer Charter.

We will use the information and details you have provided to us to examine and respond to your query. Your email will be kept in the QCS mailbox which is password protected and accessible only to those officials working on the QCS account. Emails to this account are retained for no longer than one year, unless it is necessary to retain them for a longer period in the context of the ongoing resolution of an issue.

Go raibh maith agat as ucht do ríomhphoist chuig Seirbhís Ardchaighdeáin do Chustaiméirí na Roinne Tithíochta, Rialtais Áitiúil agus Oidhreachta. Bíonn sé d'aidhm againn do cheist a fhreagairt faoi cheann 15 lá oibre.

Kind regards

Quality Customer Service Office



## APPENDIX 2.1 : RECORDS OF CONSULTATION 2022

8<sup>th</sup> January 2024

Robert Hunt  
Senior Project Manager  
Tobin Consulting Engineers  
Market Square  
Castlebar  
Co. Mayo  
F23 Y427

**Re: Application for Substitute Consent for peat extraction and all associated bog development works within Derryadd, Derryaroge, and Lough Bannow Bogs, Longford – Remedial EIA Scoping Consultation**

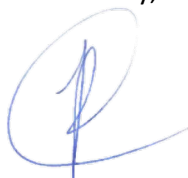
Dear Robert,

Thank you for your letter dated 11<sup>th</sup> August., requesting that Longford County Council Department submit comments relating to the remedial EIA process under Section 177E of the Planning and Development Act 2000, as amended.

**Comments**

1. The peatlands form an integral part of the landscape and heritage of South Longford, and the Planning Authority welcomes this exercise.
2. The area in question was utilised by Bord na Mona for the industrial extraction of peat from 1949 to 2019. The formal planning system in Ireland did not exist until 1963. The EIA Directive was not introduced until 1985 and formally transposed into Irish Law in 1989.
3. Longford County Development Plan 2021 – 2027 contains policies concerning the future of cutaway bogs. These include supporting the preparation of a holistic plan for the development of industrial peatlands at a regional scale that promotes economic development, tourism, rural diversification, environmental protection, and natural and cultural heritage awareness.
4. All works should be carried out in accordance with the Guidelines on the information to be contained in the Environmental Impact Assessment Reports (May 2022).

Yours Sincerely,



---

**A/Senior Planner**

Robert Hunt  
Senior Project Manager  
Tobin Consulting Engineers  
Market Square  
Castlebar  
Mayo  
F23 Y427  
22/08/2022

Dear Mr Hunt

**Re: Application for Substitute Consent for peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs, Longford – Remedial EIA Scoping Consultation**

Dear Robert

Thank you for your letter dated 11<sup>th</sup> August., requesting that Longford County Council Department submit comments relating to the remedial EIA process under Section 177E of the Planning and Development Act 200, as amended.

#### Comments

1. The peatlands form an integral part of the landscape and heritage of South Longford and the Planning Authority welcomes this exercise.
2. The area in question was utilised by Born na Mona for the industrial extraction of peat from 1946 to 2019. The formal planning system in Ireland did not exist until 1963. The EIA Directive was not introduced until 1985 and formally transposed into Irish law in 1989.
3. Longford County Development Plan 2021-2027 contains policies concerning the future of cutaway bogs. These include supporting the preparation of a holistic plan for the development of industrial peatlands at a regional scale that promotes economic development, tourism, rural diversification, environmental protection and natural and cultural heritage awareness.
4. All works should be carried out in accordance with the Guidelines on the Information to be contained in Environmental Impact Assessment Reports (May 2022).

Yours sincerely'



Donall Mac An Bheatha, Senior Planner.

## Rhianna McDonnell

---

**From:** Louise Lynch  
**Sent:** Monday 15 August 2022 16:03  
**To:** Robert Hunt  
**Subject:** FW: Peat EXTRACTION

---

**From:** Ministers Office <noreplymo-dccae@corr.cloud.gov.ie>  
**Sent:** Monday 15 August 2022 15:58  
**To:** Info <Info@tobin.ie>  
**Subject:** Re: Peat EXTRACTION

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Our Ref: CCAE-MO-02381-2022

15th August 2022

Dear Robert

I write to acknowledge receipt of your correspondence dated 11th August 2022.

I will ensure that this is brought to the Minister's attention.

Yours sincerely,

Dean Maher

Minister's Office

“”

Department of the Environment, Climate and Communications (DECC) An Roinn Comhshaoil, Aeráide agus Cumarsáide

29-31 B<sup>3</sup>thar Adelaide, Baile Átha Cliath, D02 X285

29-31 Adelaide Road, Dublin 2, D02 X285



Your Ref: 11400 - Derryadd

Our Ref: G Pre00206/2022 (Please quote in all related correspondence)

22 September 2022

Tobin Consulting Engineers  
Fairgreen House  
Fairgreen Road  
Galway

Via email: [Robert.Hunt@tobin.ie](mailto:Robert.Hunt@tobin.ie)

**Proposed Pre Planning Development: TOBIN, on behalf of Bord na Móna: for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryarogue and Lough Bannow Bogs located in County Longford: Derryadd, Derryarogue and Lough Bannow**

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

### **Nature Conservation**

The following observations are made by the Department in its role as a prescribed body under planning legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives).

These observations are intended to assist the planning authority in meeting obligations that may arise in relation to European sites (Natura 2000 sites) in the context of the proposed development. In relation to European sites (Special Areas of Conservation, SAC; Special Protection Areas, SPA), the Department places particular emphasis in its observations on the level of detail contained in the screening for Appropriate Assessment (AA) and Natura Impact Statement (NIS). An AA determination must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the conservation objectives and integrity of a European site.

Furthermore the screening for AA should be sufficiently detailed to demonstrate how the conclusion was reached and on what scientific grounds; it should also apply the best available techniques and methods to assess the extent of effects. The appraisal of the effects must be based on objective and quantifiable criteria to allow an AA of the implications of the proposed development for the conservation objectives and integrity of the European sites. The Department notes that the conclusions of any appropriate assessment must be certain,



with the assessment based on based on the best available scientific evidence and containing no lacunae.

These observations should not be taken to represent an exhaustive list, and the Minister reserves the position to make further related and or separate submissions at later stages in the planning process, should the Department deem it necessary or appropriate to do so.

The Department notes that a remedial EIA Report (rEIAR) is being prepared to support the application for Substitute Consent to ABP for the Application Site. The lands in question are of interest for a potential windfarm - Derryaddwindfarm.ie.

The Department recommends that previous comments that have been made by the Department in reference to substitute consent applications relating to Bord na Mona Bogs are also referred to in order to ensure that any similar issues have been addressed in the current scenario. See appendix.

#### **Extracts from TOBIN application letter:**

*Application for Substitute Consent for peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs, Longford – Remedial EIA Scoping Consultation.*

*Derryadd, Derryaroge and Lough Bannow Bogs (henceforth referred to as “the Application Site”) form part of Bord na Móna’s Mountdillon Bog Group, which comprises a total area of approx. 11,778 ha and consists of mostly cutaway bog land as well as partly developed bog land, a drainage network, pumping stations, internal roads and machine/rail passes, yards, railway lines and site entrances accessing the surrounding public road network. The Application Site comprises approx. 2,314 ha of the Mountdillon Bog Group.*

*Derryadd Bog is located approximately 4km to the east of Lanesborough and the site is located within one main block. A rail link connects the site with Derryarogue to the north and Lough Bannow to the south. Derryarogue Bog is located immediately to the north of Derryadd Bog (separated by the N63 Longford to Roscommon Road) and is located within two main sections, a western (smaller) section and an eastern section in which the majority of the site is located. A long section of rail line to the west of the site connects the bog with the former power station site in Lanesborough. A rail bridge across the River Shannon is also part of the Derryarogue site. Lough Bannow Bog is situated approximately 7km southeast of Lanesborough along the R392 Road. The R398 Regional Road runs along the north of the site while a secondary road (Keenagh road) runs along part of the southern section of the site. The Royal Canal passes within 500m of the eastern edge of the site*

*There are no sites designated under the EU Habitats Directive and EU Birds Directive, i.e., Special Area of Conservation (SAC) or Special Protection Area (SPA), located within the*



*footprint of the Application Site. The nearest designated sites are Lough Ree SPA and SAC approximately 2.5km west of Derryaroge Bog, Ballykenny-Fisherstown Bog SPA approximately 4.5km north of Derryaroge Bog and Lough Bawn proposed Natural Heritage Area (pNHA) along the south-east margins of Lough Bannow Bog. Lough Bannow pNHA is also located close to the western boundaries of Derryaroge and Derryadd Bogs.*

These bogs have pumped bog drainage. Pumping of the site was critical to sustaining the industrial peat production areas, and a number of pumps were previously in operation. It is the Department's understanding that pumping is ongoing, and some pumping is likely to continue to support potential future land-use. Details of operational pumps should be provided in the rEIAR, as well as details of the intended maintenance of water levels, including an assessment of the ecological impact. Higher winter water levels would allow greater usage by wintering birds, and high summer water levels may protect breeding waders such as lapwing from predators.

The Department recommends that the rEIAR should have historical and up to date information on the pumping regime and the proposed future pumping and water levels. Records of the pumping regime, both historical, current and projected, should be detailed. If the water level is maintained artificially low, it will be difficult to provide clear assessment of the ecological potential of the bog sites.

The Department considers that the maintenance and provision of drains, including boundary drains, has the potential to have effects on nearby Natura 2000 sites, including wetland sites, habitats and species. An adequate assessment of these impacts should be made. Field surveys are required to establish the baseline condition of these drains and whether maintenance, upgrading, or blocking, is necessary. Maps of drains should be included in the assessment which should establish connections with nearby European sites. Details of works to be undertaken and cumulative impacts should be included in the assessment.

The bogs and the surrounding low lying lands on peaty soils should be subject to carbon budget analysis to assess carbon sequestration. The Department emphasises that compliance with existing licences is not sufficient to establish compliance with the European Habitats and Birds Directives, as there may nonetheless be biodiversity loss and ecological impacts.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in the role as statutory consultee under the Planning and Development Act, 2000, as amended.



You are requested to send further communications to the Development Applications Unit (DAU) at [manager.dau@housing.gov.ie](mailto:manager.dau@housing.gov.ie).

Is mise le meas,

A handwritten signature in black ink, appearing to read 'Diarmuid Buttiner', located below the text 'Is mise le meas,'.

**Diarmuid Buttiner**  
**Development Applications Unit**  
**Administration**





Your Ref: 11400 - Derryadd

Our Ref: G Pre00206/2022 (Please quote in all related correspondence)

22 September 2022

Tobin Consulting Engineers  
Fairgreen House  
Fairgreen Road  
Galway

Via email: [Robert.Hunt@tobin.ie](mailto:Robert.Hunt@tobin.ie)

**Proposed Pre Planning Development: TOBIN, on behalf of Bord na Móna: for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryarogue and Lough Bannow Bogs located in County Longford: Derryadd, Derryarogue and Lough Bannow**

A chara

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Is mise le meas,

A handwritten signature in black ink, appearing to read 'Diarmuid Buttiner', located below the text 'Is mise le meas,'.

**Diarmuid Buttiner**  
**Development Applications Unit**  
**Administration**

## Rhianna McDonnell

---

**From:** Housing Manager DAU <Manager.DAU@housing.gov.ie>  
**Sent:** Friday 12 August 2022 11:12  
**To:** Robert Hunt  
**Subject:** RE: 11400 - Derryadd Substitute Consent rEIAR Scoping - DAU

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Our Ref: G Pre00206/2022 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email [manager.dau@housing.gov.ie](mailto:manager.dau@housing.gov.ie).

Regards

Diarmuid

**Diarmuid Buttimer**

*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**

**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

**Oifigí an Rialtais**

*Government Offices*

**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90**

Newtown Road, Wexford, County Wexford, Y35 AP90

[Diarmuid.Buttimer@housing.gov.ie](mailto:Diarmuid.Buttimer@housing.gov.ie)

[Manager.DAU@housing.gov.ie](mailto:Manager.DAU@housing.gov.ie)

---

**From:** Robert Hunt <Robert.Hunt@tobin.ie>  
**Sent:** Thursday 11 August 2022 17:17  
**To:** Housing Manager DAU <Manager.DAU@housing.gov.ie>  
**Subject:** 11400 - Derryadd Substitute Consent rEIAR Scoping - DAU

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Hi,

TOBIN, on behalf of Bord na Móna, are preparing a planning application for Substitute Consent for historical peat extraction and all associated bog development works within Derryadd, Derryarogue and Lough Bannow Bogs located in County Longford. We are preparing a remedial Environmental Impact Assessment Report (rEIAR) as part of the planning application and we are inviting comments or observations from relevant stakeholders.

Please see details in the attached scoping letter. Any queries on the attached, feel free to contact me on the below details.

Regards,

Robert

Robert Hunt BEng MSc CEng MCIWM

Senior Project Manager

TOBIN Consulting Engineers

Galway | Dublin | Castlebar | Limerick

Telephone: +353 (0)1 8030401

Email: [robert.hunt@tobin.ie](mailto:robert.hunt@tobin.ie)

Website: <http://www.tobin.ie>



*2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management*

*2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*

*2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*

*2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation*

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Patrick J TOBIN & Co. Ltd is a company with limited liability, registered in Galway, Ireland. Registered Number 042654. Registered Office is Fairgreen House, Fairgreen Road, Galway.

## Rhianna McDonnell

---

**From:** Robert Hunt  
**Sent:** Tuesday 13 September 2022 12:15  
**To:** 'don.watchorn@defence.ie'  
**Cc:** Ryan O'Toole  
**Subject:** 11400 - Derryadd Longford\_ BnaM Substitute Consent  
**Attachments:** 5. 11400 Derryadd SC rEIAR Scoping - DoD.pdf

Dear Mr. Watchorn,

Many thanks for the attached reply to our consultation request received by post on 08 September 2022.

I'm just responding to clarify that our letter of 11 August 2022 (Ref. 11400-L-001j) is in reference to an application for Substitute Consent for historical peat extraction works at the named bogs. The application to An Bord Pleanála is required to regularize the planning status of the bogs and the historical activities carried out thereon. Subject to receiving approval from An Bord Pleanála, we would hope to lodge the application before the end of the year.

Separately, my colleagues in TOBIN are working on a planning application with Bord na Móna for wind energy development at the site which is also expected to be submitted to An Bord Pleanála. I have shared the attached correspondence with that team so they are aware of the Department's observations.

This separate team will also be distributing information on the proposed wind farm to relevant stakeholders, including the Department of Defence, in the coming weeks for the purpose of consultation on that project.

Hope the above is helpful and if you have any further queries, please feel free to call me on (094) 9021 401.

Kind Regards,

Robert

Robert Hunt BEng MSc CEng MCIWM  
Senior Project Manager

TOBIN Consulting Engineers  
Galway | Dublin | Castlebar | Limerick  
Telephone: +353 (0)1 8030401  
Email: [robert.hunt@tobin.ie](mailto:robert.hunt@tobin.ie)  
Website: <http://www.tobin.ie>



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## **2018** *Engineers Ireland Excellence Awards Winner: Heritage and Conservation*

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Robert Hunt  
Senior Project Manager  
For and on behalf of Tobin Consulting Engineers  
Market Square,  
Castlebar, Co Mayo  
F23 Y427

07 September 2022

**Re: Application for Substitute Consent for peat extraction and all associated bog development works within Derryadd, Derryaroge and Lough Bannow Bogs, Co. Longford – Remedial EIA Scoping Consultation**

Dear Mr. Hunt,

I refer to your letter, dated 11 August 2022 and your invitation for the Department of Defence to submit relevant comments or information.

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.

Following consultations with our Air Corps colleagues at Casement Aerodrome, The Department of Defence would like to make the following observation:

Single turbines, structures, or turbines delineating the windfarm should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or of a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.



We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the planning stage.

Please contact me if you have any queries in this regard.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Don Watchorn', positioned above the printed contact details.

Don Watchorn  
Property Management Branch  
Department of Defence  
Station Road  
Newbridge  
Co. Kildare W12 AD93  
045 492199 [don.watchorn@defence.ie](mailto:don.watchorn@defence.ie)

## Caroline Naughton

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Monday 15 January 2024 14:27  
**To:** Caroline Naughton  
**Subject:** RE: 11400 - Derryadd Substitute Consent rEIAR Scoping - Failte Ireland

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Hello Caroline,

Sorry for the delay in replying to your email. I've checked back on our files, we made no comment on this project.

Regards,

Yvonne

**Yvonne Jackson**

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86  
M +353 (0)86 0357590



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---

**From:** Caroline Naughton <caroline.naughton@tobin.ie>  
**Sent:** Thursday, January 4, 2024 5:14 PM  
**To:** planning applications <planning.applications@failteireland.ie>; Robert Hunt <Robert.Hunt@tobin.ie>  
**Subject:** RE: 11400 - Derryadd Substitute Consent rEIAR Scoping - Failte Ireland

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Hello Yvonne,

Happy New Year to you.

I am just following up on the below scoping consultation request as my former colleague Robert Hunt is no longer with TOBIN.

Did you have any comments on this project description?

Thank you.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
Website: <http://www.tobin.ie>



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**From:** planning applications <[planning.applications@failteireland.ie](mailto:planning.applications@failteireland.ie)>  
**Sent:** Friday, August 12, 2022 2:38 PM  
**To:** Robert Hunt <[Robert.Hunt@tobin.ie](mailto:Robert.Hunt@tobin.ie)>  
**Subject:** RE: 11400 - Derryadd Substitute Consent rEIAR Scoping - Failte Ireland

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Hello Robert,

Thank you for your email and scoping letter, we will review the details and revert with feedback if necessary. Is there a timeline for feedback?

Regards,

Yvonne

**Yvonne Jackson**

**Product Development-Environment & Planning Support | Fáilte Ireland**

88-95 Amiens Street, Dublin 1, D01 WR86

**M** +353 (0)86 0357590



**From:** Robert Hunt <[Robert.Hunt@tobin.ie](mailto:Robert.Hunt@tobin.ie)>

**Sent:** Thursday 11 August 2022 17:19

**To:** planning applications <[planning.applications@failteireland.ie](mailto:planning.applications@failteireland.ie)>

**Subject:** 11400 - Derryadd Substitute Consent rEIAR Scoping - Failte Ireland

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Hi,

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Regards,

Robert

**Robert Hunt** BEng MSc CEng MCIWM

**Senior Project Manager**

**TOBIN Consulting Engineers**

**Galway | Dublin | Castlebar | Limerick**

**Telephone:** +353 (0)1 8030401

**Email:** [robert.hunt@tobin.ie](mailto:robert.hunt@tobin.ie)

**Website:** <http://www.tobin.ie>



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## Rhianna McDonnell

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Friday 12 August 2022 14:38  
**To:** Robert Hunt  
**Subject:** RE: 11400 - Derryadd Substitute Consent rEIAR Scoping - Failte Ireland

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Hello Robert,  
Thank you for your email and scoping letter, we will review the details and revert with feedback if necessary. Is there a timeline for feedback?

Regards,

Yvonne

**Yvonne Jackson**

**Product Development-Environment & Planning Support | Fáilte Ireland**

88-95 Amiens Street, Dublin 1, D01 WR86

M +353 (0)86 0357590



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**Sent:** Thursday 11 August 2022 17:19  
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Regards,

Robert

**Robert Hunt** BEng MSc CEng MCIWM

**Senior Project Manager**

**TOBIN Consulting Engineers**

**Galway | Dublin | Castlebar | Limerick**

**Telephone:** +353 (0)1 8030401

**Email:** [robert.hunt@tobin.ie](mailto:robert.hunt@tobin.ie)

Website: <http://www.tobin.ie>



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Did you have any comments on this project description?

Thank you.

Kind regards,

**Caroline Naughton**  
Senior Project Manager

**TOBIN**  
Galway | Dublin | Castlebar | Limerick | Sligo  
Telephone: +353 61 976262  
Email: [caroline.naughton@tobin.ie](mailto:caroline.naughton@tobin.ie)  
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**Yvonne Jackson**

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88-95 Amiens Street, Dublin 1, D01 WR86

**M** +353 (0)86 0357590



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**Sent:** Thursday 11 August 2022 17:19

**To:** planning applications <[planning.applications@failteireland.ie](mailto:planning.applications@failteireland.ie)>

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Regards,

Robert

**Robert Hunt** BEng MSc CEng MCIWM

**Senior Project Manager**

**TOBIN Consulting Engineers**

**Galway | Dublin | Castlebar | Limerick**

**Telephone:** +353 (0)1 8030401

**Email:** [robert.hunt@tobin.ie](mailto:robert.hunt@tobin.ie)

**Website:** <http://www.tobin.ie>



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## Robert Hunt

---

**From:** Walsh Muireann <Muireann.Walsh@tii.ie>  
**Sent:** Monday 5 September 2022 15:54  
**To:** Robert Hunt  
**Subject:** EIA Scoping Consultation - Derryadd, Derryaroge and Lough Bannow Bogs, Longford

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**Dear Mr. Hunt,**

I acknowledge receipt of your letter of 11 August relating to the above Remedial EIAR Scoping exercise, your reference 11400-L-002s refers.

TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

TII notes the proposed site extents traverse the N63, national secondary road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e., non-public road access) to national roads, to which speed limits greater than 50 kph apply. Therefore, there are policy and road safety considerations that are required to be considered in any subsequent application; alternative arrangements may need to be considered.

With respect to rEIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the National Roads Network.

The developer/scheme promoter should have regard, inter alia, to the following;

- TII notes that the subject site adjoins the N63, national secondary road. Therefore, there are official policy and road safety considerations that would need to be resolved in relation to access to national roads as outlined above,
- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development; N63, national secondary road,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications

imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts,

- The developer, in preparing rEIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),
- The developer, in preparing rEIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
- The rEIAR/EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)),
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs,
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,
- In the interests of maintaining the safety and standard of the national road network, the rEIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network,
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I trust that the above comments are of use in your rEIAR preparation.

**Yours sincerely,**

**Alban Mills**

**Senior Regulatory and Administration Executive**

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## Rhianna McDonnell

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**From:** Robert Hunt  
**Sent:** Thursday 22 September 2022 15:53  
**To:** John Dillon; Laura McGrath; Ryan O'Toole  
**Subject:** FW: 22/352\_Application for substitute consent for peat extraction, Derryadd, Derryaroge and Loch Bannow bogs, Longford  
**Attachments:** GSI datasets relevant to EIA & SEA\_20210421.pdf; 22\_352 Peat extraction Co Longford.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

John/Laura,  
See attached consultation response from the GSI for the Derryadd SC Application – all very generic.  
[@Ryan O'Toole](#) – can you log and forward this one on as well.  
Regards,  
Robert

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**From:** Clare Glanville <Clare.Glanville@decc.gov.ie>  
**Sent:** Thursday 22 September 2022 14:36  
**To:** Robert Hunt <Robert.Hunt@tobin.ie>  
**Cc:** GSI Planning <GSIPlanning@GSI.ie>  
**Subject:** 22/352\_Application for substitute consent for peat extraction, Derryadd, Derryaroge and Loch Bannow bogs, Longford

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Dear Sir / Madam,  
With reference to your letter received on the 22 August 2022, concerning the Application for substitute consent for peat extraction, Derryadd, Derryaroge and Loch Bannow bogs, Longford, please find attached response and dataset sheet from Geological Survey Ireland.  
If you have any further queries or if we can be of further assistance, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).  
Yours sincerely,  
Clare Glanville  
Geological Survey Ireland



**Dr Clare Glanville Senior Geologist Geoheritage & Planning.**

**Geological Survey Ireland**, Booterstown Hall, Booterstown Ave., Blackrock, Dublin A94 N2R6, Ireland. **T** +353 (0)1 678 2000 **E** [clare.glanville@DECC.gov.ie](mailto:clare.glanville@DECC.gov.ie) [www.gsi.ie](http://www.gsi.ie)

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*A division of the Department of the Environment, Climate and Communications.*

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.



Robert Hunt  
Tobin Consulting Engineers  
Market Square  
Castlebar  
Co Mayo, F23 Y427

22 September 2022

**Re: Application for substitute consent for peat extraction, Derryadd, Derryaroge and Loch Bannow bogs, Longford**  
**Your Ref: 11400-L-002ae**  
**Our Ref: 22/352**

Dear Robert,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter received on the 22 August 2022, concerning the Application for substitute consent for peat extraction, Derryadd, Derryaroge and Loch Bannow bogs, Longford, Geological Survey Ireland would encourage use of and reference to our datasets. please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

### **Geoheritage**

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for Co. Longford was carried out in 2015. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the peat extraction in Derryadd, Derryaroge and Loch Bannow bogs.**

### **Groundwater**

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

**The Groundwater Data Viewer indicates two aquifers classed as a 'Regionally Important Aquifer - Karstified (conduit)' and a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlie the peat extraction areas. The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.**



[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with local authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>.

### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

### **Geochemistry of soils, surface waters and sediments**

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>.

### **Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Dr. Clare Glanville  
**Senior Geologist**  
**Geological Survey Ireland**

Trish Smullen  
**Geoheritage and Planning Programme**  
**Geological Survey Ireland**

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes

**Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes**  
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018  
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c</a>
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Radon Map	Land & Soils/Air	National		<a href="http://www.epa.ie/radiation/radonmap/">http://www.epa.ie/radiation/radonmap/</a>
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228</a>
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b</a>
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0</a>
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c</a>
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	<a href="https://secure.dcaa.gov.ie/goldmine/index.html">https://secure.dcaa.gov.ie/goldmine/index.html</a>
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx</a>
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a9916dc0b9e">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a9916dc0b9e</a>
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		<a href="https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/">https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/</a>
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		<a href="http://www.cherishproject.eu/en/">http://www.cherishproject.eu/en/</a>
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx</a>
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Active quarries	Land & Soils	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	<a href="https://gis.epa.ie/EPAMaps/default?teasing=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities">https://gis.epa.ie/EPAMaps/default?teasing=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities</a>
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>

**Notes:**

- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
- Please read all disclaimers carefully when using Geological Survey Ireland data
- Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

