



APPENDIX 2-1

SCOPING RESPONSES

Subject: FW: rEIAR fo Past Peat Extraction Activities at Lemanaghan Bog, Co. Offaly 200804-e

From: INFO <Information@tii.ie>

Sent: 22 September 2022 09:22

To: Karen Mulryan <kmulryan@mkoireland.ie>

Subject: rEIAR fo Past Peat Extraction Activities at Lemanaghan Bog, Co. Offaly

Dear Ms. Mulryan,

I acknowledge receipt of your letter of 24 August relating to the above Remedial EIAR Scoping exercise.

Transport Infrastructure Ireland (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.

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 adjoin the N62, national secondary road, at a location on the network that is subject to a general 100kph speed limit. The rEIAR Scoping document outlines that access to the site has been taken from the N62 as well as the R436. 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 road network.

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

- TII notes that the subject site adjoins the N62, 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; N62, 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 & Administration Executive
Ref No. TII22-120175

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Ciarán Fitzgerald

From: INFO <Information@tii.ie>
Sent: Monday 8 July 2024 14:57
To: Brodie Ní Thuathail
Subject: TII24-127774 - rEIAR Scoping response in relation to Substitute Consent for Peat Extraction at Lemanaghan Bog, Co. Offaly on behalf of Bord na Móna.

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A Chara,

Thank you for your correspondence of 21 June 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.

TII notes reference to previous rEIAR Scoping Request for the above project. TII responded to that request under TII ref. TII22- 120175 in September 2022.

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.

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 and/or light rail networks.

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, the Authority 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,
- 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 (TTA) 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 Partnerships (PPP) Concessions, Motorway Maintenance and Renewal Contractors (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 Companies 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.

Notwithstanding 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 EIAR preparation.

Mise le meas,

Rachel Begley

Regulatory & Administration Executive



In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

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Emily Lynch

From: EIAPanning <eiapanning@epa.ie>
Sent: 02 September 2022 13:34
To: Emily Lynch
Cc: Lorraine Meehan
Subject: FW: 200804-e BnM Lemanaghan Subcon- Scoping Request
Attachments: EPA Scoping Request Form- 200804-e - 22.08.30.docx; Lemanaghan Subcon Scoping - F- 2022.08.24 - 200804-e.pdf

Hi Emily,
The IPC Licence referred to in the Scoping report is P0500-1 but it is P0503-01 in the Scoping request form.
Can you confirm which is the correct Licence Register number?

Kind regards,
Marian Doyle

Environmental Licencing Programme
Office of Environmental Sustainability
An Clár um Cheadúnú Comhshaoil
Oifig um Inbhuanaitheacht Chomhshaoil



053-916 0600 (Switch)

eiapanning@epa.ie

www.epa.ie



From: Emily Lynch <elynych@mkoireland.ie>
Sent: Tuesday 30 August 2022 17:02
To: EIAPanning <eiapanning@epa.ie>
Cc: Lorraine Meehan <lmeehan@mkoireland.ie>
Subject: 200804-e BnM Lemanaghan Subcon- Scoping Request

Dear Sir/ Madam,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at Lemanaghan Bog. The total site area covers 1,250 hectares. The site is located approximately 3.5 kilometres (km) northeast of Ferbane and approximately 2.5 km southwest of the village of Ballycumber in Co. Offaly.

As part of the EIA process, we would welcome any comments that you may have in relation to the proposed project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

If you could return any comments or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind Regards,
Emily.



Emily Lynch
Graduate Environmental Scientist

MKO
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Emily Lynch

From: EIAPanning <eiapanning@epa.ie>
Sent: 07 October 2022 12:42
To: Emily Lynch
Cc: Lorraine Meehan
Subject: Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Ref 2537
Attachments: EPA Scoping Request Form- 200804-e - 22.08.30.docx; Lemanaghan Subcon Scoping - F- 2022.08.24 - 200804-e.pdf; RE: Scoping Consultation under Section 83(2A)(de) of the Environmental Protection Agency Act 1992 - Reference 2537

Re: Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Ref 2537

Dear Ms Lynch,

I refer to the request for a Scoping Opinion on the scope and level of detail to be included in an EIAR in relation to substitute consent for peat extraction activities at Lemanaghan Bog, located in Lemanaghan and surrounding townlands, north-east of Ferbane, County Offaly, which was received by the Agency on 30th August 2022.

In accordance with the requirements of Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU *on the assessment of the effects of certain public and private projects on the environment* (EIA Directive), and Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended, the Agency has consulted with the Planning Authority Offaly County Council and the relevant prescribed bodies under Section 89 of the EPA Act. I attach a copy of the response received from the Health Services Executive. The remainder of the bodies consulted have not provided a response within the timeframe set out.

Bord na Mona Energy Limited was issued an Integrated Pollution Control (IPC) Licence (Register No. P0500-01) on 18th May 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 *'the extraction of peat in the course of business which involves an area exceeding 50 hectares'* at Boora Group, c/o Boora Works, Leabeg, Tullamore, Offaly.

Having regard to the specific characteristics of the project and likely impact on the environment, the Agency is of the opinion that the scope and level of detail to be included in the remedial environmental impact assessment report should as a minimum:

- (i) address the matters raised in the responses received from the bodies detailed above;
- (ii) have regard to licence conditions, in particular the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0500-01 for any relevant bog areas;
- (iii) consideration should be given to inclusion of any relevant bog areas in an enhanced rehabilitation scheme, e.g., under the Peatlands Climate Action Scheme (PCAS).
- (iv) have regard to relevant water quality monitoring data. Any gaps in water quality data for receiving waters should be filled by a sampling programme over an appropriately representative period of time.
- (v) have regard to the EPA's *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, which are available at the following link: <https://www.epa.ie/publications/monitoring-->

[assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment-reports-eiar.php](https://www.epa.ie/assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment-reports-eiar.php).

If you require any further information in relation to this matter, please contact the undersigned.
For all further queries and correspondence relating to planning and EIA matters, please contact eiaplanning@epa.ie

Yours faithfully,
Environmental Licensing Programme

Environmental Licensing Programme
Office of Environmental Sustainability
An Clár um Cheadúnú Comhshaoil
Oifig um Inbhuanaitheacht Chomhshaoil



053-916 0600 (Switch)

eiaplanning@epa.ie

www.epa.ie



From: Emily Lynch <elynch@mkoireland.ie>
Sent: Tuesday 30 August 2022 17:02
To: EIAPanning <eiaplanning@epa.ie>
Cc: Lorraine Meehan <lmeehan@mkoireland.ie>
Subject: 200804-e BnM Lemanaghan Subcon- Scoping Request

Dear Sir/ Madam,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIA) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at Lemanaghan Bog. The total site area covers 1,250 hectares. The site is located approximately 3.5 kilometres (km) northeast of Ferbane and approximately 2.5 km southwest of the village of Ballycumber in Co. Offaly.

As part of the EIA process, we would welcome any comments that you may have in relation to the proposed project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIA. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

If you could return any comments or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind Regards,
Emily.



Emily Lynch
Graduate Environmental Scientist

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Ciarán Fitzgerald

From: EIAPanning <eiapanning@epa.ie>
Sent: Thursday 8 August 2024 18:08
To: bnithuathail@mkoireland.ie; Catherine Johnson
Subject: 200804-e Lemanaghan Subcon Scoping - EPA
Attachments: 2537 Lemanaghan Bog- Scoping Opinion - 07 Oct 2022.pdf

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Dear Sir/ Madam,

See attached EIAR Scoping Opinion in relation to substitute consent for peat extraction activities at Lemanaghan Bog, Ferbane, County Offaly, which issued to MKO Consultants on 07 October 2022.

For all further queries and correspondence relating to planning matters, please contact eiapanning@epa.ie.

Yours faithfully,

Water, Energy and Business Support Programme
Office of Environmental Sustainability
An Clár um Cheadúnú Comhshaoil
Oifig um Inbhuanaitheacht Chomhshaoil



053-916 0600 (Switch)

eiapanning@epa.ie

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From: Brodie Ní Thuathail <bnithuathail@mkoireland.ie>
Sent: Friday, June 21, 2024 3:54 PM
To: EIAPanning <eiapanning@epa.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>
Subject: 200804-e Lemanaghan Subcon Scoping - EPA

Dear Sir or Madam,

MKO has been engaged to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (r(NIS) alongside a substitute consent application from past peat extraction activities at Lemanaghan bog Co. Offaly.

We would have reached out to you in 2022 already. However, as some time has passed, we wish to reach out again to ensure all queries and comments are captured. If you have any queries or comments in relation to the attached, please do not hesitate to contact to me.

Kind regards,
Brodie.

Brodie Ní Thuathail

Graduate Environmental Scientist

MKO

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From: [EIAPlanning](#)
To: elynych@mkoireland.ie
Cc: Imeehan@mkoireland.ie
Subject: Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Ref 2537
Date: Friday 7 October 2022 12:41:52
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[EPA Scoping Request Form- 200804-e - 22.08.30.docx](#)
[Lemanaghan Subcon Scoping - F- 2022.08.24 - 200804-e.pdf](#)
[image004.png](#)
[image007.png](#)
[image008.png](#)
[RE Scoping Consultation under Section 83\(2A\)\(de\) of the Environmental Protection Agency Act 1992 - Reference 2537.msg](#)

Re: Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Ref 2537

Dear Ms Lynch,

I refer to the request for a Scoping Opinion on the scope and level of detail to be included in an EIAR in relation to substitute consent for peat extraction activities at Lemanaghan Bog, located in Lemanaghan and surrounding townlands, north-east of Ferbane, County Offaly, which was received by the Agency on 30th August 2022.

In accordance with the requirements of Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU *on the assessment of the effects of certain public and private projects on the environment* (EIA Directive), and Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended, the Agency has consulted with the Planning Authority Offaly County Council and the relevant prescribed bodies under Section 89 of the EPA Act. I attach a copy of the response received from the Health Services Executive. The remainder of the bodies consulted have not provided a response within the timeframe set out.

Bord na Mona Energy Limited was issued an Integrated Pollution Control (IPC) Licence (Register No. P0500-01) on 18th May 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 *'the extraction of peat in the course of business which involves an area exceeding 50 hectares'* at Boora Group, c/o Boora Works, Leabeg, Tullamore, Offaly.

Having regard to the specific characteristics of the project and likely impact on the environment, the Agency is of the opinion that the scope and level of detail to be included in the remedial environmental impact assessment report should as a minimum:

- (i) address the matters raised in the responses received from the bodies detailed above;
- (ii) have regard to licence conditions, in particular the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0500-01 for any relevant bog areas;
- (iii) consideration should be given to inclusion of any relevant bog areas in an enhanced rehabilitation scheme, e.g., under the Peatlands Climate Action Scheme (PCAS).

- (iv) have regard to relevant water quality monitoring data. Any gaps in water quality data for receiving waters should be filled by a sampling programme over an appropriately representative period of time.
- (v) have regard to the EPA's *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, which are available at the following link: <https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment-reports-eiar.php>.

If you require any further information in relation to this matter, please contact the undersigned.

For all further queries and correspondence relating to planning and EIA matters, please contact eiaplanning@epa.ie

Yours faithfully,

Environmental Licensing Programme

Environmental Licencing Programme
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From: Emily Lynch <elynch@mkoireland.ie>

Sent: Tuesday 30 August 2022 17:02

To: EIAPanning <eiaplanning@epa.ie>

Cc: Lorraine Meehan <lmeehan@mkoireland.ie>

Subject: 200804-e BnM Lemanaghan Subcon- Scoping Request

Dear Sir/ Madam,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at Lemanaghan Bog. The total site area covers 1,250 hectares. The site is located approximately 3.5 kilometres (km) northeast of Ferbane and approximately 2.5 km southwest of the village of Ballycumber in Co. Offaly.

As part of the EIA process, we would welcome any comments that you may have in relation to the proposed project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the rEIAR. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

If you could return any comments or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind Regards,
Emily.



Emily Lynch
Graduate Environmental Scientist

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Ciarán Fitzgerald

From: planning applications <planning.applications@failteireland.ie>
Sent: Tuesday 2 July 2024 14:34
To: Brodie Ní Thuathail
Cc: Catherine Johnson
Subject: RE: 200804-e Lemanaghan Subcon Scoping - Failte Eireann
Attachments: Fáilte Ireland EIAR Guidelines 2023.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hello Brodie,

Thank you for your email regarding past peat extraction activities at Lemanaghan bog Co. Offaly.

Please see attached a copy of Fáilte Ireland's Guidelines (**updated 2023**) 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: Brodie Ní Thuathail <bnithuathail@mkoireland.ie>
Sent: Friday, June 21, 2024 3:52 PM
To: planning applications <planning.applications@failteireland.ie>

Cc: Catherine Johnson <cjohnson@mkoireland.ie>
Subject: 200804-e Lemanaghan Subcon Scoping - Failte Eireann

[ATTENTION] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Ms Jackson,

MKO has been engaged to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (r(NIS) alongside a substitute consent application from past peat extraction activities at Lemanaghan bog Co. Offaly.

We would have reached out to you in 2022 already. However, as some time has passed, we wish to reach out again to ensure all queries and comments are captured. If you have any queries or comments in relation to the attached, please do not hesitate to contact to me.

Kind regards,
Brodie.

Brodie Ní Thuathail
Graduate Environmental Scientist

MKO

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EIAR 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 Irelands 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.

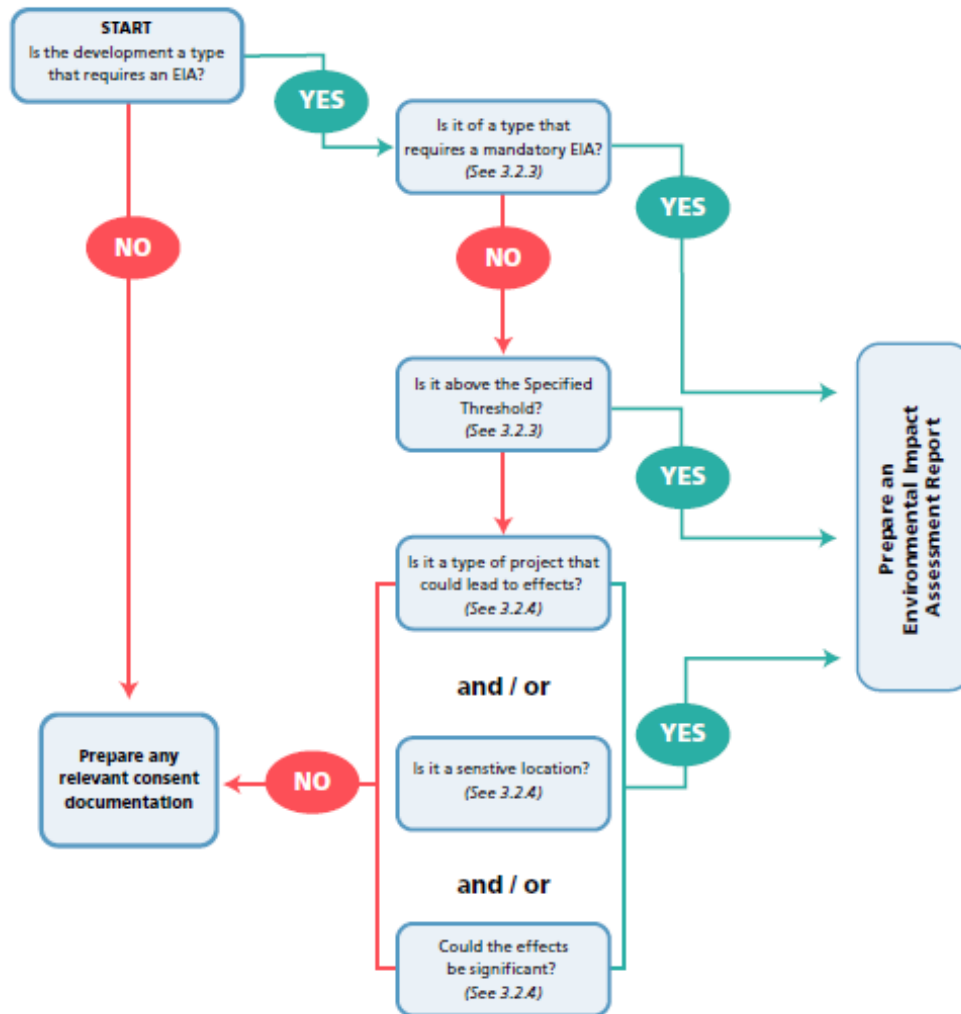
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope 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 (RSEs) 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.

Emily Lynch

From: GSI Planning <GSIPlanning@GSI.ie>
Sent: 07 September 2022 10:39
To: Emily Lynch
Cc: Clare Glanville; GSI Planning
Subject: RE: EIS 22/362 - Remedial EIA Scoping for past peat extraction facilities at Lemanaghan Bog, Co Offaly
Attachments: 22_362 Lemanaghan Bog Co Offaly.pdf; GSI datasets relevant to EIA & SEA_20210421.pdf

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Dear Emily, Karen,

With reference to your letter dated 24 August 2022, concerning the Remedial Environmental Impact Assessment Scoping Document for Substitute Consent Application for past peat extraction activities at Lemanaghan Bog, Co. Offaly, 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 Trish Smullen, or my colleague Clare Glanville at GSIPlanning@gsi.ie.

Yours sincerely,

Trish Smullen
Geological Survey Ireland

From: John Butler <John.Butler@gsi.ie>
Sent: Tuesday 30 August 2022 16:22
To: Clare Glanville <Clare.Glanville@decc.gov.ie>; Sophie O'Connor <Sophie.OConnor@decc.gov.ie>; Brian McConnell <Brian.McConnell@gsi.ie>; Monica Lee <Monica.Lee@gsi.ie>; Taly Hunter Williams <Taly.HunterWilliams@gsi.ie>; Sean Cullen Sean.Cullen@gsi.ie; Charise McKeon Charise.McKeon@gsi.ie; Jim Hodgson jim.hodgson@gsi.ie; Eoin McGrath Eoin.McGrath@gsi.ie; Trish Smullen Trish.Smullen@gsi.ie
Cc: GSI Planning GSIPlanning@GSI.ie
Subject: EIS 22/362 - Remedial EIA Scoping for past peat extraction facilities at Lemanaghan Bog, Co Offaly

EIS 22/362

Remedial EIA Scoping for substitute consent for past peat extraction facilities at Lemanaghan Bog, Co Offaly. Request for observations by MKO. Letter and scoping document are enclosed.

Regards,

John

From: Emily Lynch <elynch@mkoireland.ie>
Sent: Tuesday 30 August 2022 15:41
To: John Butler <John.Butler@gsi.ie>
Cc: Lorraine Meehan <lmeehan@mkoireland.ie>
Subject: 200804-e BnM Lemanaghan Subcon- Scoping Request

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Hi John,

MKO has been engaged to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application from past peat extraction activities at Lemanaghan bog Co. Offaly. proposed developments are outlined in the attached scoping letter. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any queries or comments in relation to the attached, please do not hesitate to contact to me. Any comments would be welcomed.

If you have any questions, queries, or comments in relation to the attached, please do not hesitate to contact to me. Any comments would be welcomed.

Kind Regards,
Emily.



Emily Lynch
Graduate Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkofireland.ie



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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.

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. 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]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=84868f1e4a904a5381f950e9b5e5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provides information on the probability of future least 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]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848683d85799436808652f9e735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848683d85799436808652f9e735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plan	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CSS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e874c0ab7f6d2aa3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=d7012a99d2748ea9106e7ee1b6a8a5f5858scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=d7012a99d2748ea9106e7ee1b6a8a5f5858scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=d7012a99d2748ea9106e7ee1b6a8a5f5858scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=d7012a99d2748ea9106e7ee1b6a8a5f5858scale=0
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	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=4f76a420f54877843a1a1b0c75c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b7941c593b6b2712a850c6e8scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitalised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718ba18734d7a555a30d15b44724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.docae.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aunifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
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	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS/ GWS have 927/ 70C. Check with IW / resco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the sources	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National	protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database, thorough water levels (gal/cue/l)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7a8a202301594687b14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GMDTES; for more information contact NPWS / EPA / site investigations	https://www.epa.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geochronal Suitability maps	land & Soils/Water	National	Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae4db6e08441278b9b9a991460cb9a
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.docae.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-index.aspx
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	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee84c285a9413aa6f134416d0956
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	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee84c285a9413aa6f134416d0956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee84c285a9413aa6f134416d0956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://www.epa.ie/en-ie/infrastructure-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-index.aspx
Tellus	Geochronal data; multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304d12b733489b9964207f7272754
Tellus	Alibhoma geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304d12b733489b9964207f7272754
Tellus	urban geochemistry mapping (Dublin SURGE project)	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304d12b733489b9964207f7272754

Notes:
1. 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>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.



Karen Mulryan
MKO
Tuam Rd
Galway H91 VW84

07 September 2022

Re: Remedial Environmental Impact Assessment Scoping Document for Substitute Consent Application for past peat extraction activities at Lemanaghan Bog, Co. Offaly

Your Ref: 200804-e
Our Ref: 21/146

Dear Karen,

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 dated 24 August 2022, concerning the Remedial Environmental Impact Assessment Scoping Document for Substitute Consent Application for past peat extraction activities at Lemanaghan Bog, Co. Offaly, 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

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by 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. Offaly was carried out 2016. The full report details can be found [here](#). **Our records show that there is a CGS adjacent to the Lemanaghan Bog site boundary area.**

Clonmacnoise Esker, Co. Offaly (GR 600870E 730650N), under IGH theme: IGH7 Quaternary. Link to site report at [OY008](#). The Clonmacnoise Esker and surrounding sands and gravels includes an exceptionally large accumulation of sands and gravels deposited both under the ice sheet and at its margin as the ice withdrew westwards across Offaly at the end of the last Ice Age.

With the current plan, there are no envisaged impacts on the integrity of current CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville (Clare.Glanville@gsi.ie) for further information and possible mitigation measures if applicable.



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 a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Locally Important Aquifer - Bedrock which is Generally Moderately Productive' underlie the proposed Lemanaghan Bog site boundary area. A 'Locally important gravel aquifer' is located adjacent to the bog site boundary area. The Groundwater Vulnerability map indicates 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.

[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 Offaly Groundwater Protection Response overview and link to the main report is here:** <https://www.gsi.ie/en-ie/publications/Pages/Offaly-Groundwater-Protection-Scheme-Reports.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>.

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.



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.

Ciarán Fitzgerald

From: DECC GSI Planning <GSIPlanning@GSI.ie>
Sent: Wednesday 3 July 2024 15:14
To: Brodie Ní Thuathail
Cc: DECC GSI Planning; DECC Planning Advisory
Subject: RE: EIS 24/236 - Historical Peat Extraction at Lemanaghan bog, Co Offaly

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Dear Brodie,
With reference to your email received on the 21 June regarding the Historical Peat Extraction at Lemanaghan bog, Co Offaly, please note Geological Survey Ireland have no further comments or observations to make since our last response, (Ref: 22/362).

Yours sincerely,
Trish Smullen



Trish Smullen Geoheritage & Planning.

Geological Survey Ireland, Booterstown Hall, Booterstown Ave., Co. Dublin A94 N2R6.

Email: trish.smullen@gsi.ie www.gsi.ie

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

From: DECC GSI Planning <GSIPlanning@GSI.ie>
Sent: Friday, June 28, 2024 10:38 AM
To: Patricia Smullen (DECC) <Trish.Smullen@gsi.ie>
Cc: DECC GSI Planning <GSIPlanning@GSI.ie>; DECC Planning Advisory <PlanningAdvisory@decc.gov.ie>
Subject: EIS 24/236 - Historical Peat Extraction at Lemanaghan bog, Co Offaly

EIS 24/236

Remedial EIA Scoping – Substitute Consent for Peat Extraction at Lemanaghan bog, Co Offaly. Request for observations by MKO. Letter and rEIA document are enclosed.

Regards,

John

From: Brodie Ní Thuathail <bnithuathail@mkoireland.ie>
Sent: Friday, June 21, 2024 3:26 PM
To: John Butler (DECC) <John.Butler@gsi.ie>; DECC GSI Planning <GSIPlanning@GSI.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>
Subject: 200804-e Lemanaghan Subcon Scoping - GSI

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Dear Mr. Butler,

MKO has been engaged to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (r(NIS) alongside a substitute consent application from past peat extraction activities at Lemanaghan bog Co. Offaly.

We would have reached out to you in 2022 already. However, as some time has passed, we wish to reach out again to ensure all queries and comments are captured. If you have any queries or comments in relation to the attached, please do not hesitate to contact to me.

Kind regards,
Brodie.

Brodie Ní Thuathail
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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**HSE EIAR Scoping Report
Environmental Health Service Consultation Report
(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) &
Regulations made thereunder)**

Date:	20 September 2022
Proposed Development:	Application for Remedial Environmental Impact Assessment For Substitute Consent for past peat extraction activities at Lemanaghan Bog, Co. Offaly
Applicant:	Bord na Mona PLC
Our reference:	EHIS 2643
Report to:	Ms Karen Mulryan, MKO, Tuam Road, Galway
Consultant's reference:	200804-e
Type of consultation:	Scoping Consultation

General Introduction

The Environmental Health Service (EHS) is aware of the Supreme Court Judgement in regard to the granting of Substitute Consent and the process of remedial EIA published on the 2nd July 2020.

Supreme Court Record No: 9/19

High Court Record Number: 2014/342 JR

In this regard the leave to apply for Substitute Consent under section 177 and the granting of such is not consistent with the EIA Directives in that there should be public participation in the decision making on granting leave to apply for Substitute Consent and that the granting of this was not subject to an exceptionality test.

It is therefore the understanding of the EHS that the process of Remedial EIA (rEIA) and the granting of Substitute Consent will have to be subject to review and/or legislative change.

It is within this context that the EHS makes this submission.

The HSE will consider the final rEIAR accompanying the planning application and will in particular make comments to the Planning Authority on the methodology used for assessing the significant impacts and the evaluation criteria used in assessing the significance of the impact. Whilst it is accepted that rEIA is considering impacts that have occurred, reference will still be made to the following documents:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanala_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines.

The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes/>

Generally the EHS will consider if the rEIA has examined all significant impacts and provided the following information for each:

- a) Description of the receiving environment including licencing compliance
- b) Legislative framework
- c) Description of the development
- d) The nature and scale of the impact
- e) An assessment of the significance of the impact
- f) Mitigation measures
- g) Residual impacts.
- h) Peatland rehabilitation proposals

In particular the EHS will consider the impacts on or from:

- Noise & Vibration
- Air Quality including dust
- Surface and Ground water quality
- Geological Impacts
- Ancillary facilities

The cumulative impacts should also be assessed and evaluated in the rEIA

Population and Human Health

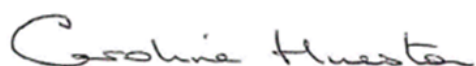
Directive 2014/52/EU has an increased requirement to assess likely significant impacts on Population and Human Health, in the case of a rEIA this is the actual impacts on Population and Human Health. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the rEIA. Guidance on wider determinants of health can be found at www.publichealth.ie

Non-Technical Summary

The Non-Technical Summary is an important document to enable public access to the information. It should accurately summarise the rEIA in non-technical language. It should identify the methodologies used and the criteria to evaluate the significant impacts and clearly state the mitigation that has been implemented. It should be easily referenced across to the main body of text.

Public Consultation

Meaningful public consultation with the local community should be carried out. All legitimate concerns from the public should be identified in the rEIA. The EIAR should clearly demonstrate how the outcome of consultation with the public influenced decision making within the EIA.



Environmental Health Officer
Environment OU
Ennistymon Health Centre
Ennistymon
Co. Clare

Ciarán Fitzgerald

From: Sabine Browne <Sabine.Browne@waterwaysireland.org>
Sent: Monday 24 June 2024 11:17
To: Brodie Ní Thuathail
Cc: Catherine Johnson; Cormac McCarthy
Subject: RE: 200804-e Lemanaghan Subcon Scoping - Waterways Ireland

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good morning Brodie,

This is not within any Zone of Influence of our waterways so we will not be commenting.

Kind regards,

Sabine Browne

From: Brodie Ní Thuathail <bnithuathail@mkoireland.ie>
Sent: Friday, June 21, 2024 4:40 PM
To: Sabine Browne <Sabine.Browne@waterwaysireland.org>; Cormac McCarthy <cormac.mccarthy@waterwaysireland.org>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>
Subject: 200804-e Lemanaghan Subcon Scoping - Waterways Ireland

Hello,

MKO has been engaged to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (r(NIS) alongside a substitute consent application from past peat extraction activities at Lemanaghan bog Co. Offaly.

We would have reached out to you in 2022 already. However, as some time has passed, we wish to reach out again to ensure all queries and comments are captured. If you have any queries or comments in relation to the attached, please do not hesitate to contact to me.

Kind regards,
Brodie.

Brodie Ní Thuathail
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

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