

An Coimisiún Pleanála
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DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

05 June 2026

Our Ref: P23035-FT-XX-XX-LTR-PL-0001

Re: Substitute Consent to regularise peat extraction and ancillary activities at Longfordpass Bog, Littleton Bog, Lanespark Bog and Derryvella Bog, Co. Tipperary.

Dear Sir/Madam,

On behalf of our client, Bord na Móna Energy Limited (hereafter referred to as *'The Applicant'*), please find enclosed a planning application for substitute consent to regularise peat extraction and ancillary activities at Longfordpass Bog, Littleton Bog, Lanespark Bog and Derryvella Bog, contained within the Littleton Bog Group, and located within the townlands of Kilmakill, Longfordpass North, Longfordpass East, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Newhill, Derryhogan, Ballybeg, Derryvella, Lanespark, and Killeen, Co. Tipperary.

This application for substitute consent is made under Section 177E (Application for Substitute Consent) of the Planning and Development Act 2000, as amended, pursuant to updates in legislation on Substitute Consent brought in under the Planning and Development, Maritime and Valuation (Amendment) Act 2022. The Planning and Development, Maritime and Valuation (Amendment) Act 2022 (Commencement of Certain Provisions) (No. 2) Order 2023 (S.I. 645 of 2023) was signed on the 15th December 2023 by Mr. Darragh O'Brien, T.D., Minister for Housing, Local Government and Heritage and came into effect on 16th December 2023.

The result of the commencement of this legislation was, inter alia, the allowance for pre-application consultations with the Commission, as well as providing for a single stage application process which removes the requirement to apply for leave to apply from the Commission. Consequently, the then pending leave to apply application in March 2023 (ACP Ref. 316033) was deemed withdrawn by the Applicant by the Commission on 15th January 2024 in accordance with the Planning and Development, Maritime and Valuation (Amendment) Act 2022 (Commencement of Certain Provisions) (No.2) Order 2023.

The purpose of this current substitute consent application is to regularise, without prejudice, the planning status of the peat extraction and ancillary activities within the Application Site.

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VAT Registration Number: IE6580497D



The Applicant

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

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

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

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

Background to the Application

The Application Site comprises Littleton, Longfordpass, Lanespark and Derryvella Bogs, which are part of the Littleton Bog Group. The Application Site comprises an area of 1,616 hectares (ha), the table below presents timelines for the works within each of the bogs:

Table 1: Operational history of the Application Site. (Source: Bord na Móna Annual Reports)

Bog Unit	Commencement of Site Preparation Works (vegetation clearance and drainage insertion)	Extraction Commenced	Extraction Ceased
Longfordpass Bog	1947	1952	2017
Littleton Bog	1941	1952	2017
Lanespark Bog	1968	1973*	2017
Derryvella Bog	1968	1973*	2017

*Aerial imagery of the Application Site shows peat extraction had commenced by 1973.



Bord na Móna records indicate that approx. 3,534,355 tonnes (sod and milled combined) were extracted from the Application Site for the period 1952 to June 1988 inclusive. Peat extraction of sod peat commenced at the Application Site in 1952 and continued until 1984, and it is assumed that milled peat extraction commenced in 1978.

Milled peat extraction continued on the Application Site until 2017, and Bord na Móna records indicate that the total volume of peat extracted at the Application Site from 1988 to 2017 is estimated to be 5,117,798 tonnes.

Industrial scale peat extraction ceased at the Application Site in 2017. Bord na Móna formally announced in January 2021 that all industrial scale peat extraction on lands within its management would permanently cease in line with its on-going climate action programme and its transition to becoming a climate solutions company. During the Current Phase, the operations at the Application Site have reduced to the removal of stockpiled peat which was completed by mid-2019.

Development Seeking Substitute Consent

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

- Installation of surface water drainage infrastructure at the Application Site to facilitate peat extraction activities from 1988 to present day;
- Vegetation clearance to facilitate peat extraction activity from 1988 to 2017;
- Industrial scale peat extraction (milled peat) at the Application Site from 1988 to 2017;
- Use and maintenance of pre-existing ancillary supporting infrastructure and services to facilitate peat extraction (e.g. railway infrastructure, drainage (drains, silt ponds, pumps), etc.), from 1988 to present day;
- Control Measures associated with the above, inclusive of the IPC Licence measures (Ref. P0499-01) which commenced from August 2001 onwards to the present day; and
- All associated site development and ancillary works.

This application relates to development which is subject to an existing Integrated Pollution Control Licence (Ref. P0499-01).

The application includes a remedial Environmental Impact Assessment Report (rEIAR) and a remedial Natura Impact Assessment (rNIS). For a detailed description of the peat extraction activities and associated works that were carried out at the Application Site, please refer to Chapter 4 - Description of the Development, Volume 2, of the rEIAR that accompanies this substitute consent application.

In line with the accompanying rEIAR, the project is defined under three different timeframes termed 'phases':

- 'Peat Extraction Phase' peat extraction and ancillary activities at the Application Site from July 1988 to the cessation of peat extraction in 2017 (July 1988 - 2017). The Peat Extraction Phase is described in detail in Sections 4.4 to 4.7 of Chapter 4 - Description of the Development, Volume 2, of the rEIAR submitted with the substitute consent application.
- 'Current Phase': the management of the Application Site since 2017 to present day including decommissioning works and Rehabilitation Phase 1 works. The Current Phase is described in detail in Sections 4.7 and 4.8 of Chapter 4 - Description of the Development, Volume 2, of the rEIAR submitted with the substitute consent application.
- 'Remedial Phase': the activities intended to be carried out at the Application Site into the future (Rehabilitation Phase 2 works). The Remedial Phase is described in detail in Section 4.9 of Chapter 4 Description of the Development, Volume 2, of the rEIAR submitted with the substitute consent application.

Enclosed Documents

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

- Planning Application Form;
- EIA Portal Confirmation;
- A cheque of the appropriate Planning Application Fee;
- Site Notice;
- Newspaper Notice;
- Cover Letter to An Coimisiún Pleanála;
- Planning Report;
- Planning Application Drawings and associated Drawing Schedule;
- Remedial Environmental Impact Assessment Report (rEIAR); and
- Remedial Natura Impact Statement (rNIS), including a remedial Appropriate Assessment Screening Report (rAASC).

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

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



Yours sincerely,

A handwritten signature in black ink, appearing to read "Trevor Byrne", is written over a horizontal line. The signature is fluid and cursive.

Trevor Byrne,

for and on behalf of **Fehily Timoney and Company**