



DESIGNING AND DELIVERING
A SUSTAINABLE FUTURE

LONGFORDPASS, LITTLETON, LANESPARK AND DERRYVELLA BOGS – APPLICATION FOR SUBSTITUTE CONSENT

Remedial Environmental Impact Assessment Report

Chapter 1 –Introduction

Prepared for:
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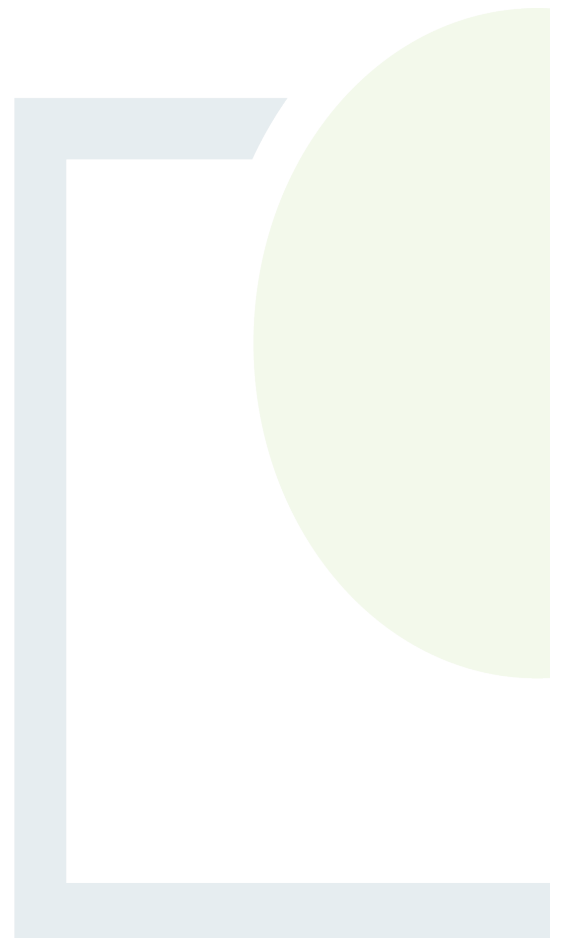


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1. INTRODUCTION

This remedial Environmental Impact Assessment Report (rEIAR) has been prepared by Fehily Timoney and Company on behalf of Bord na Móna Energy Ltd a subsidiary of Bord na Móna plc. (hereafter ‘the Applicant’), as part of an application for substitute consent for peat extraction and ancillary activities from July 1988 to the present day that have been carried out within Longfordpass, Littleton, Lanespark, and Derryvella bogs (hereafter referred to as the ‘Application Site’), located in County Tipperary. Section 177E of the Planning and Development Act 2000, as amended, permits an application to be made for substitute consent in respect of development which has been carried out where an Environmental Impact Assessment (EIA), screening for EIA and/or Appropriate Assessment (AA) was or is required.

Neither the European Union Council Directive 85/337/EEC of 27th June 1985 on the assessment of the effects of certain public and private projects on the environment (hereafter referred to as the ‘EIA Directive’) nor the European Union Council Directive 92/43/EEC of 21st May 1992 on the conservation of natural habitats and of wild fauna and flora (hereafter referred to as the ‘Habitats Directive’) has retrospective effect; neither Directive imposes legal requirements to have carried out prior assessments of projects which had already commenced or been completed. There was, therefore, no legal requirement for EIA, screening for EIA or Appropriate Assessment in respect of any project prior to the latest dates for transposition of the Directives. In the case of the EIA Directive, the latest date for transposition was 3rd July 1988. In the case of the Habitats Directive, the latest date for transposition was 10th June 1994.

The application for substitute consent is seeking consent for development which took place from July 1988,¹ the timeframe for when the EIA Directive was required to be transposed into Irish Law, to present day.

This rEIAR provides a description of:

- i. The activities employed at the Application Site from 1941 at the onset of preparation works up to July 1988;
- ii. A description of the baseline environment as of July 1988;
- iii. A description of peat extraction and ancillary activities at the Application Site from July 1988 to the cessation of peat extraction in 2017;
- iv. A description of the management of the Application Site since 2017; and,
- v. A description of the activities intended to be carried out at the Application Site into the future.

Under Article 1(2) of the EIA Directive, ‘project’ means:

*“- the execution of construction works or of other installations or schemes,
- other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources.”*

¹ Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment



For the purposes of this rEiAR, the items outlined in bold above outline the ‘Project’, the effects on the environment of which, if any, will be examined in this rEiAR. The Project formed part of an overall development at the Application Site which commenced many years prior to July 1988. As such, to facilitate as complete an assessment as is possible of the project since July 1988, a description of the development pre-1988 is included in this rEiAR (see Section 4.3 in Chapter 4 of this EiAR). This rEiAR forms part of a substitute consent application which is made to An Coimisiún Pleanála (hereafter referred to as ‘the Commission’ or ‘ACP’ as appropriate throughout this rEiAR) as prescribed under Part XA 177F of the Planning and Development Act 2000 (as amended). It is accompanied by a remedial Natura Impact Statement (rNIS).

Industrial scale peat extraction was permanently ceased by the Applicant at the Application Site in 2017. From 2017 until 2019, all remaining stockpiled peat was systematically removed from the Application Site. The Applicant’s statutory duties to discharge the conditions of its Integrated Pollution Control Licence (IPC) Licence (Ref. P0499-01; hereafter “IPC Licence”), from the Environmental Protection Agency for the Littleton Bog Group, which encompasses the Application Site, also remain on-going. These ongoing duties, such as environmental monitoring, do not facilitate the continuation of peat extraction, but rather ensure compliance with the Applicant’s extant IPC Licence.

1.1.1 References to Project Phases

For the purposes of this 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 Section 4.7 of Chapter 4 - Description of Development, Volume 2.
- ‘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 Section 4.7 and Section 4.8 of Chapter 4 - Description of Development, Volume 2.
- ‘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 Development, Volume 2.

1.2 **Legislative Context**

1.2.1 Remedial EIA Legislative Context

Prior to the 20th of September 2012, all industrial scale peat extraction activities were classified as exempted development. The Environment (Miscellaneous Provisions) Act 2011 came into effect on the 20th of September 2012 which inserted Section 4(4) to the Act. Section 4(4) legislates that development which is typically exempt (e.g. industrial peat extraction pre-2012) is no longer exempt if an EIA or an AA of the development is required. Notwithstanding this provision, the legal planning status of commercial peat extraction remained uncertain and unclear in practice up until September 2019, as described below.

The Planning & Development (Amendment) Act 2010 introduced Part XA – Substitute Consent to the legislation. Procedural details on substitute consent applications were inserted by Article 26 of S.I. No. 476/2011 – Planning and Development (Amendment) (No. 3) Regulations 2011.



Substitute consent is the statutory planning application process to allow for regularisation of historical development of land that would require EIA if that development were to be the subject of a planning application under current legislation. The substitute consent process also provides for circumstances where an EIA, a determination as to whether an environmental impact assessment is required, or an appropriate assessment, was or is required and has not been carried out. The local authority can serve a notice on the developer requiring an application for substitute consent to be made to the Commission.

Alternatively, in circumstances where a notice has not been served by the local authority the developer may opt to make an application for substitute consent to the Commission. It is this alternative circumstance that is applicable to this application.

Sections 6, 7 and 8 of the Planning and Development, and Residential Tenancies, Act 2020 and the Planning and Development (Amendment) (No. 2) Regulations 2020 introduced changes to the substitute consent procedure in response to the Supreme Court judgment issued on 1st July 2020 in the “Ballysax/ McQuaid” cases - three joined appeal cases relating to two quarries (*An Taisce v An Bord Pleanála*, *An Taisce v An Bord Pleanála*, and *Sweetman v An Bord Pleanála* [2020] IESC 39). This judgment, delivered by Mr. Justice McKechnie, found that certain provisions of the substitute consent system in the Planning and Development Act 2000 (as amended) were inconsistent with the provisions of Directive 2011/92/EU, as amended by Directive 2014/52/EU in terms of requiring exceptional circumstances and public participation.

Section 8 of the Planning and Development, and Residential Tenancies, Act 2020 amends section 177K of the Planning and Development Act 2000 (as amended) under a new subsection (1A) whereby the Commission is precluded from granting substitute consent unless it is satisfied that exceptional circumstances exist that would justify the grant of such consent. Section 177(D)(2) of the Planning and Development Act 2000 (as amended) outlines the matters to be considered by the Commission in determining whether “exceptional circumstances” exist.

In March 2022, the Applicant submitted an application to An Coimisiún Pleanála (ACP Ref. 316033) for leave to apply for substitute consent under Section 177E of the Planning and Development Act 2000 (as amended) for peat extraction and ancillary activities at Application Site. In accordance with the specific amendments proposed to the substitute consent process in the Planning and Development, Maritime and Valuation (Amendment) Act 2022, (which were commenced on the 16th of December 2023 by Ministerial Order S.I. 645,) any such application for leave to apply for substitute consent which had not been determined by the Commission before that commencement date shall be deemed to have been withdrawn by the Applicant. As such, the application for leave (ACP Ref.316033) which was submitted to the Commission was withdrawn in January 2024.

This rEIAR is accompanied by an application to the Commission for substitute consent, as prescribed under Part XA 177F of the Planning and Development Act 2000 (as amended):

“Section 177F.— (1) A F858 [remedial environmental impact assessment report] shall contain the following: (a) a statement of the significant effects, if any, on the environment, which have occurred or which are occurring or which can reasonably be expected to occur because the development the subject of the application for substitute consent was carried out; (b) details of— (i) any appropriate remedial measures undertaken or proposed to be undertaken by the applicant for substitute consent to remedy any significant adverse effects on the environment; n(ii) the period of time within which any proposed remedial measures shall be carried out by or on behalf of the applicant; (c) such information as may be prescribed under section 177N.”



1.2.2 EIA Legislative Context

The consolidated European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), has been transposed into Irish planning legislation through the amendment of the Planning and Development Act 2000 and the Planning and Development Regulations 2001. Directive 2011/92/EU was amended by Directive 2014/52/EU which has been transposed into Irish law under European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018), amending the Planning and Development Act, 2000 and the Planning and Development Regulations 2001.

This rEIAR complies with the EIA Directive as amended by Directive 2014/52/EU, the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations (as amended).

An Environmental Impact Assessment (EIA) of the Project will be undertaken by the Commission as part of their consideration of the application for planning permission for the Project.

Article 5 of the EIA Directive provides where an EIA is required, the developer shall prepare and submit a remedial environmental impact assessment report (rEIAR). The information to be provided by the developer shall include at least:

- a) a description of the project comprising information on the site, design, size and other relevant features of the project;
- b) a description of the likely significant effects of the project on the environment;
- c) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- d) 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;
- e) a non-technical summary of the information referred to in points (a) to (d); and
- f) any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

In addition, Annex IV of the EIA Directive provides further detail on the information to be included in an EIAR. These requirements are transposed under Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (as amended), with which this EIAR complies. In addition, Part 19, Article 222A of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an rEIAR. FTC was appointed as environmental consultant on the Project and commissioned to prepare this rEIAR in accordance with the requirements of the EIA Directive.

1.3 The Applicant

Bord na Móna Energy Ltd. (hereafter referred to as Bord na Móna) a subsidiary of Bord na Móna plc. is an Irish, semi-state climate solutions company helping lead Ireland towards a climate neutral future. 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 to enhance national energy security through peat harvesting and became Bord na Móna in 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 harvesting and now focus on developing climate solutions in renewable energy, sustainable waste management, carbon storage, and biodiversity conservation. Ireland has committed to ambitious climate goals and Bord na Móna’s climate solutions are helping to achieve them. Bord na Móna’s vision is to help Ireland reach net zero greenhouse gas emissions by 2050.

To power a net zero future, Bord na Móna are expanding its renewable energy infrastructure. Although they have been constructing and maintaining large-scale infrastructure for decades, the company is now using that experience to build renewable energy developments across the country. These developments are transforming the way the nation generates and consumes energy. Ireland has committed to generating 80% of electricity from renewable sources by 2030 and Bord na Móna is working across wind, solar, biomass and biogas to help achieve this target and to provide energy security for future generations.

Bord na Móna currently provides employment for approximately 1,500 people and manages a land holding of over 80,000 hectares located mainly in the Irish midlands. At their peak, employment numbers exceeded 7,400 in the early 1960s, with the workforce dropping to approximately 2,000 by the late 1990s.

In 2021, Bord na Móna Powergen Ltd., a subsidiary of Bord na Móna Plc., launched a joint venture with SSE Renewables for a development consisting of 11 no. wind turbines and associated works at the Application Site, known as Littleton Wind Farm ([Littleton Wind Farm](#)). This application will be made directly to An Coimisiún Pleanála as ‘Strategic Infrastructure Development’ (SID) under the provisions of Section 37E of the Planning and Development Act 2000 (as amended). This position was confirmed by An Coimisiún Pleanála in correspondence to the Applicant dated 24th March 2026 following pre-application consultations with the Commission under Section 37B of the Act (ABP-307471-20). The proposed Littleton Wind Farm will be cumulatively assessed with the Project as appropriate and insofar as practicable in this rEIAR.

1.4 Project Description

Substitute consent is being sought by the Applicant of their own volition to regularise, without prejudice, the planning status of the Application Site to facilitate appropriate future uses of these lands in compliance with the requirements of the planning system. Substitute consent is being sought for the relevant peat extraction and ancillary activities and related activities that were undertaken at the Application Site from 1988 onwards, including the following:

- Installation of surface water drainage infrastructure at the Application Site to facilitate peat extraction activity from 1988 to 2017;
- 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 within the Application Site (e.g., railway infrastructure, drainage (drains, silt ponds, pumps), machine passes etc.), from 1988 to present day; and
- 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;
- All associated site development and ancillary works.

These peat extraction and ancillary activities are referred to as the 'Project' as appropriate. A full description of the Project is included in Chapter 4 - Description of the Development, Volume 2.

1.5 Background to the Application

Bord na Móna is a semi-state company which was established from the Turf Development Board Ltd. following the commencement of the Turf Development Act 1946, with the aim of developing national peat resources and thereby providing security of energy supply and economic benefit for Irish communities. Under Bord na Móna's Second Development Programme, drainage works, buildings and railway networks were established at the Application Site from 1941, with the commencement of peat extraction activities in 1952. Aerial imagery from 1973 confirms that the Application Site was subject to peat extraction prior to 1988.

Industrial-scale peat extraction ceased at the Application Site in 2017, and the Applicant formally announced in January 2021 that peat extraction across all its land holdings would permanently cease. With the cessation of peat extraction, the former peat production fields will naturally revegetate and evidence for this is already apparent within the Application Site. However, full revegetation will likely take some time and measures to aid the site rehabilitation are outlined in the bog specific Bord na Móna Cutaway Bog Decommissioning and Rehabilitation Plans (refer to Appendix 4-2, Volume 3).

The latest dates for the transposition of the EIA and Habitats Directives were 3rd July 1988 and 10th June 1994 respectively. These Directives do not purport to have retrospective effect, i.e., neither the EIA Directive nor the Habitats Directive apply to works undertaken prior to 1988 and 1994 respectively. As such, substitute consent is being sought to regularise the planning status of the Application Site for the period 1988 to the present day. This application is being made strictly without prejudice to the fact that the development benefitted from exempted development status for part of the period covered by this application.

1.5.1 Site Location

The Application Site comprises Lanespark Bog, Longfordpass Bog, Derryvella Bog and Littleton Bog which are part of the Littleton Bog Group. The Application Site comprises an area of c. 1,616 hectares (ha) within which bog drainage works began in 1941 followed by the commencement of peat extraction from 1952. The Application Site is located within north County Tipperary, c.3km east of Littleton, The Application Site location is shown on Plate 1-1. The Application Site extends across several townlands which are listed below in **Table 1-2**. The Application Site measures approximately c.12km in length from north to south, and approximately c.3km from east to west, at its widest point. ITM co-ordinates for the approximate site centre are E 623625.971 , N 656437.625.



Table 1-1: Townlands within which the Application Site is located.

Bog Reference	County	Townlands
Littleton	Tipperary	Kilmakill, Longfordpass North, Longfordpass East, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Newhill, Derryhogan, Ballybeg, Derrylvella, Lanespark, and Killeen.
Total Spatial Footprint		1,616ha

The current main access points to the Application Site includes an existing entrance off the L2111 Local Road and along the L4101 adjacent to the Littleton Works site in the south of the Application Site. Under the Water Framework Directive (WFD; Directive 2000/60/EC), the Application Site is located within the Suir (16) catchment. More locally, one sub catchments is present within the Application Site; the Suir_SC_040 subcatchment. There are a number of European Sites (SACs and SPAs), Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) located in the vicinity of the development:

- The Loughans SAC (000407) (c. 7.8km east of Application Site)
- Lower River Suir SAC (002137) (c. 9.3km west of Application Site)
- River Barrow and River Nore SAC (002162) (c. 8.9km southeast of Application Site)
- Spahill and Clomantagh Hill SAC (000849) (c. 9.8km northeast of Application Site)
- Galmoy Fen SAC (001858) (c. 11.8km northeast of Application Site)
- Cullahill Mountain SAC (000831) (c. 13.8km northeast of Application Site)
- River Nore SPA (004233) (c. 21.6km southeast of Application Site)
- Slievefelim to Silvermines Mountains SPA (004165) (c. 26.9km west of Application Site)
- Slieve Bloom Mountains SPA (004160) (c. 27.7km north of Application Site)
- Slievenamon Bog NHA (002388) (c. 18.8km southeast of Application Site)
- Kilcooly Abbey pNHA (000958) (c. 5km east of the Application Site)
- The Loughans pNHA (000407) (c. 7km northeast of the Application Site)
- Spahill & Clomantagh Hill pNHA (000849) (c. 10km northeast of the Application Site)
- Cabragh Wetlands pNHA (001943) (c 10km west of the Application Site)
- Killough Hill pNHA (000959) (c. 8.5km west of the Application Site)
- Laffansbridge pNHA (000965) (c. 4km south of the Application Site)

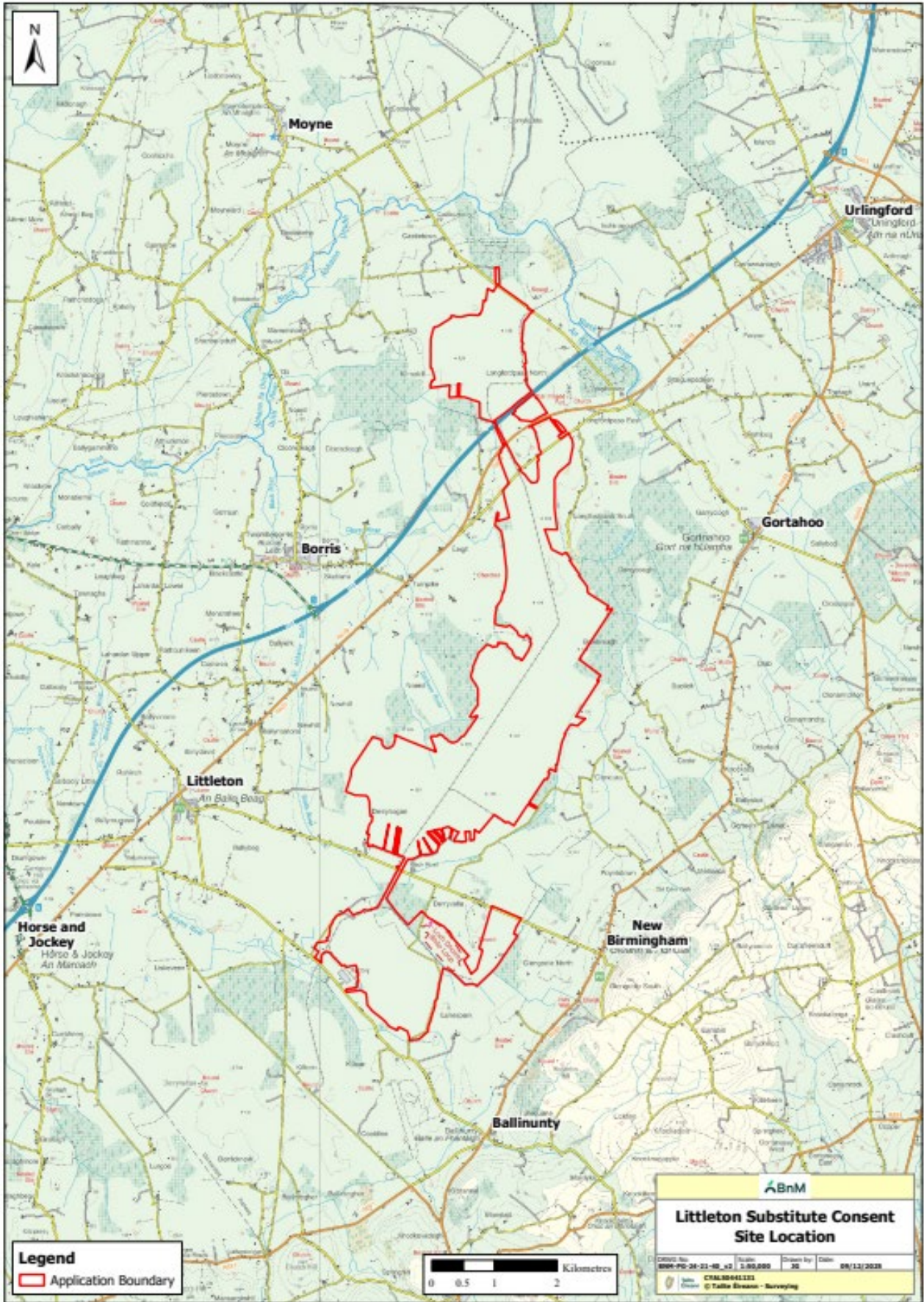


Plate 1-1: Site Location



1.5.2 Site Context

The landcover within the Application Site comprises a mix of bare cutaway peat, re-vegetated peat, degraded blanket bog, wetlands and scrub, low woodland, heath. Today, the topography of the Application Site ranges between 130m above ordnance datum (AOD) at its highest point to 117mOD at its lowest point.

The Application Site has a total area of c.1,616ha, with approximately 141ha therein subject to peat extraction at the point of cessation in 2017. The bog is currently drained by a series of northwest-southeast orientated drains spaced at approximately 15m intervals. The activities carried out by Bord na Móna at the Application Site are licensed by the EPA under IPC Licence P0499-01.

There are a number of ancillary structures and features associated with the peat extraction activities and ancillary works that occurred at the Application Site, as described in detail in Section 4.2.3 of Chapter 4 - Description of Development, Volume 2. These include:

- Littleton Works;
- Works Offices;
- Local holding areas; and,
- Railway infrastructure.

Onsite infrastructure still present and functional across the Application Site today includes:

- Surface water drainage system including silt ponds, pump sites, and drainage channels;
- De-mountable rail network including rail lines, at grade rail crossings and ancillary infrastructure;
- Electricity distribution infrastructure; and,
- Site access points.

The Littleton Works (hereafter 'the Works'), which comprises the Littleton Briquette Factory, workshops, offices, canteen and staff parking is located adjacent to the Application Site boundary. Littleton Works provided a central location for support and management services to the Application Site and includes workshops, offices and welfare facilities such as toilets, a canteen, staff parking and the Littleton Briquette Factory. The workshops and offices at Littleton Works were originally constructed prior to the enactment of the *Planning and Development Act 1963* (i.e. 1st of October 1964) and therefore no planning permission was required for the buildings at the time of their construction. Furthermore, as stated in the Act, all buildings which were constructed prior to October 1964 do not require planning permission and would not be subject to retrospective planning permission or Substitute Consent. Regular upgrades and renovations have been carried out to the infrastructure and buildings since their original construction, however these works would not have been subject to planning permission as there was no change to the structure of the building. The Littleton Briquette Factory received planning consent in July 1977 (Tipperary Reg Ref. 4576) and was opened in 1982. This application for Substitute Consent does not include the infrastructure and buildings at the Littleton Works. Littleton Works is described in full in Section 4.2.3 of Chapter 4 – Description of Development, Volume 2.

The landcover and uses surrounding the Application Site comprises a mixture of forestry, agricultural land, cutover and cutaway peatland, one-off rural housing and small village settlements. Cutaway peatlands are those areas where all commercially viable volumes of peat have been extracted. Cutover peatlands are those areas where peat extraction has occurred, and commercially viable peat volumes remain.



1.5.2.1 Littleton Bog

Littleton Bog (c. 1,010 ha) is situated approximately 3km to the east of Twomileborris in County Tipperary. Existing rail line runs north to south on Littleton Bog connecting it to Longfordpass Bog in the north and Lanespark Bog in the south. There is a rail underpass in the south of Littleton Bog connecting the bog to the former Littleton Works. Littleton Bog contains four pump sites, none of which are active today. As shown in Chapter 8 - Hydrology, Hydrogeology and Water Quality, Volume 2, BLACK (TWO MILEBORRIS)_010 (code: IE_SE_16B010100), flows adjacent to the south-west of Littleton bog, in a north westerly direction, while CLOVER_010 (code IE_SE_16C040100) flows to the west of the bog in a northerly direction. To the east of Littleton Bog, DRISH_010 (code: IE_SE_16D020040) flows adjacent to the eastern boundary of the bog, in a northerly direction.

1.5.2.2 Longfordpass Bog

Longfordpass Bog (c. 265 ha) is located approximately 8.5 km to the east of Thurles in County Tipperary. Longfordpass Bog is located within two main sections which are divided by the M8 that separates Longfordpass North from Longfordpass South and Littleton Bog located directly to the south. Existing Bord na Móna rail infrastructure connects Longfordpass Bog to Littleton Bog to the south. A double line railway underpass crosses the M8 connecting Longfordpass North to Longfordpass South. As shown in Chapter 8 - Hydrology, Hydrogeology and Water Quality, Volume 2, DRISH_020 (Code: IE_SE_16D020068) flows along the eastern boundary in a northerly direction while DRISH_050 (Code: IE_SE_16D020200) flows along the western boundary of the bog in a westerly direction.

1.5.2.3 Lanespark Bog

Lanespark Bog (c. 248 ha) is situated approximately 5.5km to the south of Twomileborris in County Tipperary. Rail infrastructure exists connecting Lanespark Bog to Littleton Bog to the north and Derrylvella Bog to the east. As shown in Chapter 8 - Hydrology, Hydrogeology and Water Quality, Volume 2, the North Glengoole_010 (code: IE_SE_16N280780), flows to the north of Lanespark Bog and passes through Lanespark and Derrylvella Bog, in a north westerly direction. The BREAGAGH (TIPPERARY)_010 (code: IE_SE_16B030200), also flows adjacent to the southern site boundary of Lanespark bog, in a north westerly direction, but does not flow within the bog.

1.5.2.4 Derrylvella Bog

Derrylvella Bog (c. 93 ha) is located approximately 6 km to the south-east of Twomileborris in County Tipperary. The bog is located within one main block. Existing Bord na Móna rail infrastructure connects Derrylvella Bog to Lanespark Bog to the west. As shown in Chapter 8 - Hydrology, Hydrogeology and Water Quality, Volume 2, the North Glengoole_010 (code: IE_SE_16N280780), flows to the east and south of Derrylvella Bog and passes through Lanespark and Derrylvella Bog, in a north westerly direction, while BLACK (TWO MILEBORRIS)_010 (Code: IE_SE_16B010100) flows along the northeaster boundary of the bog in a westerly direction.

1.6 Purpose and Scope of the rEIAR

The purpose of this rEIAR is to document the current state of the environment in the vicinity of the Application Site and to assess, in accordance with the requirements of the EIA Directive, the likely significant effects which have occurred, or which are occurring, or which can reasonably be expected to occur on the environment due to peat extraction and ancillary activities at the Application Site. The scope of the impact assessment is peat extraction and ancillary activities from July 1988 to the present day.



It is important to distinguish the remedial Environmental Impact Assessment (rEIA) to be carried out by An Coimisiún Pleanála, from this rEIAR which is accompanying the substitute consent application. The rEIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the 2011 EIA Directive (2011/92/EU as amended by 2014/52/EU), the direct and indirect effects of the Development on the following:

- a) Population and human health
- b) Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC
- c) Land, soil, water, air, and climate
- d) Material assets, cultural heritage and the landscape
- e) The interaction between the factors referred to in points (a) to (d)

This rEIAR submitted by the Applicant provides the relevant environmental information to enable the rEIA to be carried out by the competent authorities. The information to be contained in the rEIAR is prescribed in Article 5 and Annex IV of the revised EIA Directive and Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (as amended) described in Section 1.2 above.

1.7 Structure and Content of the rEIAR

1.7.1 General Structure

This rEIAR uses the grouped structure method to describe the existing environment, the potential impacts of the Project thereon and the proposed mitigation measures. Background information relating to the Project, scoping and consultation undertaken and a description of the Project are presented in separate sections. The grouped format sections describe the impacts of the Project in terms of population and human health, biodiversity, with specific attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EEC; land, soils and geology, water, air quality, climate, noise and vibration, landscape and visual, cultural heritage and material assets such as traffic and transportation, together with the interaction of the foregoing, schedule of mitigation and monitoring, and risk of major accidents and vulnerability to disasters.

The chapters of this rEIAR are included in Volume 2 of this rEIAR, and are as follows:

1. Introduction
2. Background
3. Consideration of Reasonable Alternatives
4. Description of the Development
5. Population and Human Health
6. Biodiversity (including Ornithology)
7. Land, Soils and Geology
8. Hydrology, Hydrogeology and Water Quality
9. Air Quality
10. Noise and Vibration
11. Landscape and Visual
12. Cultural Heritage



13. Material Assets (including Traffic and Transport)
14. Climate
15. Interactions
16. Schedule of Mitigation and Monitoring Measures

The rEIAR also includes a Non-Technical Summary (NTS), Volume 1 which is a condensed and easily comprehensible version of the rEIAR document. The NTS is laid out in a similar format to the main rEIAR document and comprises a description of the Project (as part of the Development) followed by the existing environment, impacts and mitigation measures presented in the grouped format.

Appendices to the chapters listed above are included in Volume 3 of this rEIAR with the figures associated with the chapters listed above included in Volume 4.

1.7.2 Description of Likely Significant Effects and Impacts

As stated in the 'Guidelines on the Information to be contained in Environmental Impact Assessment Reports' (EPA, 2022), an assessment of the likely impacts of a project is a statutory requirement of the EIA process. The statutory criteria for the presentation of the characteristics of potential impacts requires that potential significant impacts are described with reference to the extent, magnitude, complexity, probability, duration, frequency, reversibility and trans-frontier nature (if applicable) of the impact.

The classification of impacts in this rEIAR follows the definitions provided in the Glossary of Impacts contained in the following guidance documents produced by the European Commission (EC) and the Environmental Protection Agency (EPA):

- Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (Department of Housing, Local Government and Heritage, 2018); and,
- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (EC, 2017).

Table 1-2 below, presents the glossary of impacts as published in the EPA guidance document. Standard definitions are provided in this glossary, which permit the evaluation and classification of the quality, significance, duration and type of impacts associated with a project on the receiving environment. The use of pre-existing standardised terms for the classification of impacts ensures that the rEIA employs a systematic approach, which can be replicated across all disciplines covered in the rEIAR. The consistent application of terminology throughout the rEIAR facilitates the assessment of the impacts on the receiving environment.

Each impact is described in terms of its quality, significance, duration and type, where possible. A 'Do-Nothing' impact is also predicted in respect of each environmental theme in the rEIAR. Residual impacts are also presented following any impact for which control measures are prescribed. The remaining impact types are presented as required or applicable throughout the rEIAR. Any potential interactions between the various aspects of the environment assessed throughout this rEIAR are presented in Chapter 15- Interactions, Volume 2.



Table 1-2: Impact Classification Terminology (EPA, 2022)

Impact Characteristic	Term	Description
Quality	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative	A change which reduces the quality of the environment
Significance	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
	Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate	An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends
	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment
	Profound	An effect which obliterates sensitive characteristics
Extent and Context	Extent	Describe the size of the area, number of sites and the proportion of a population affected by an effect
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions
Probability	Likely	Effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented



Impact Characteristic	Term	Description
	Unlikely	Effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented
Duration and Frequency	Momentary	Effects lasting from seconds to minutes
	Brief	Effects lasting less than a day
	Temporary	Effects lasting less than a year
	Short-term	Effects lasting one to seven years
	Medium-term	Effects lasting seven to fifteen years
	Long-term	Effects lasting fifteen to sixty years
	Permanent	Effect lasting over sixty years
	Reversible	Effects that can be undone, for example through remediation or restoration
	Frequency	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Type	Indirect	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway
	Cumulative	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.
	'Do Nothing'	The environment as it would be in the future should the subject project not be carried out
	Worst Case'	The effects arising from a project in the case where mitigation measures substantially fail
	Indeterminable	When the full consequences of a change in the environment cannot be described
	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost



Impact Characteristic	Term	Description
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant effect is of greater significance than the sum of its constituents

1.8 Project Team

1.8.1 Project Team Responsibilities

The companies and staff listed in **Table 1-3** rEIAR Project Team were responsible for completion of the rEIAR. Further details regarding project team members are provided below.

The rEIAR project team comprises a multidisciplinary team of experts with extensive experience in environmental impact assessment in their relevant area of expertise. The qualifications and experience of the principal staff from each company involved in the preparation of this rEIAR are summarised in Table 1-1 below. Each chapter of this rEIAR has been prepared by a competent expert in the subject matter. Further details on project team expertise are provided in the Statement of Authority at the beginning of each impact assessment chapter.

Table 1-3: rEIAR Project Team

Consultants	Name	rEIAR Input
Fehily Timoney and Company Bord na Mona Energy Ltd	Emma Cross Margaret Gleeson Jim Hughes Trevor Byrne Evan Rossiter Robyn Nicholl Anthony Ryan Alice Clarke Rita Mansfield Ida Wulff Philip McDowell	Project Managers, Scoping and Consultation, Preparation of Natura Impact Statement and the following Chapters: <ul style="list-style-type: none"> • 1. Introduction • 2. Background • 3. Consideration of Reasonable Alternatives • 4. Description of the Development • 5. Population and Human Health • 6. Biodiversity • 11. Landscape and Visual • 13. Material Assets (including Traffic and Transport) • 15. Interactions • 16. Schedule of Mitigation and Monitoring Measures



Consultants	Name	rEIAR Input
	Aoife Hurd Pamela Shiel Cathal Creedon	
HES and Fehily Timoney and Company	Aaron Clarke Ian Boyle Michael Gill Conor McGettigan	Flood Risk Assessment, Drainage Assessment and Preparation of the following Chapters: <ul style="list-style-type: none"> • 7. Land, Soils and Geology • 8. Hydrology, Hydrogeology and Water Quality
Fehily Timoney and Company	Brian Cronin Maureen Marsden John Cullen	Chapter 9: Air Quality Chapter 14: Climate Chapter 10: Noise and Vibration
John Cronin and Associates	Tony Cummins	Preparation of Chapter 12: Cultural Heritage

1.8.2 Project Team Members

A comprehensive list of the Project Members and their CVs are located at Appendix 1-1, Volume 3.

1.9 Difficulties Encountered

Drainage works for peat extraction commenced at its earliest at the Application Site in 1941. The retrospective impact assessments have been carried out based on the reasonable availability of information relating to the peat extraction and ancillary activities. In addition to references within this rEIAR, the assessments have been limited by the following:

- While every effort has been made to source historical baseline environmental data, this rEIAR has been limited by the availability, completeness, accuracy, age and accessibility of data.

The Methodology section of each chapter describes the approach to the impact assessment within that chapter, and where there may be data gaps, this is clearly highlighted.



1.10 Viewing and purchasing the rEIAR

Copies of this rEIAR and accompanying rNIS will be available online, including the NTS, on the website of An Coimisiún Pleanála under the relevant Planning Reference Number (to be assigned on lodgement of the application).

- An Coimisiún Pleanála: <http://www.pleanala.ie/>

This rEIAR and all associated documentation will also be available for viewing at the offices of both An Coimisiún Pleanála and Tipperary County Council. The rEIAR may be inspected free of charge or purchased by any member of the public during normal office hours at the following address:

- An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.
- Tipperary County Council,
Civic Offices, Limerick Road
Nenagh
Tipperary
E45A 099
Ireland

The rEIAR and rNIS will also be available to view online via the Department of Planning, Housing and Local Government's EIA Portal, which will provide a link to the planning authority's website on which the application details are contained. This EIA Portal was recently set up by the Department as an electronic notification to the public of requests for development consent which are accompanied by an EIAR. (<https://housinggov.ie/maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>)



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