



DESIGNING AND DELIVERING  
A SUSTAINABLE FUTURE

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

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## Remedial Environmental Impact Assessment Report

### Chapter 2 – Background

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Prepared for:  
Bord na Móna Energy Ltd



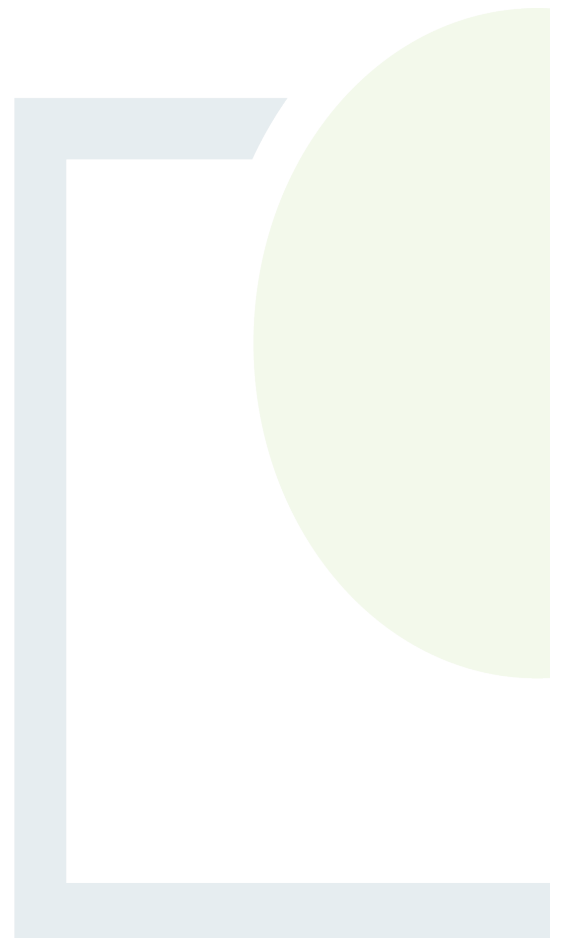
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## 2. BACKGROUND

This section of Chapter 2 - Background, Volume 2, of the remedial Environmental Impact Assessment Report (rEIAR) sets out the strategic planning context for regularising the planning status of the peat extraction and ancillary activities that have been carried out within the Application Site, including detailed consideration of the operational and planning history of the Littleton, Longfordpass, Lanespark and Derryvella bogs. Chapter 2 - Background, Volume 2, of the rEIAR considers relevant National, Regional and Local climate action, planning policy and objectives. It sets out the scoping and consultation completed, and the cumulative impact assessment process undertaken as part of this rEIAR. This chapter also outlines the historical background of peat extraction at the Application Site from a strategic perspective, as it was the historical development policies which not only resulted in the development of the Application Site for peat extraction, but facilitated the continuance of peat extraction and ancillary activities at the Application Site through the decades up to and beyond the rEIAR baseline assessment year of 1988.

The Application Site lies within the functional area of Tipperary County Council (TCC), and therefore the local policy context is determined by the current and previous Tipperary County Development Plans (CDP's) and the relevant provisions set out therein. The Application Site forms part of the Littleton Bog Group and is located in Littleton and surrounding townlands in County Tipperary. The Application Site, comprising an approximate area of 1,616 ha, is located approximately 3 kilometres (km) east of Littleton Village. Figure 2-1 below illustrates a site location map indicating the extent of lands included within the Application Site.

The current main access points to the Application Site includes an existing entrance along the L4101 adjacent to the Littleton Works site in the south of the Application Site. Peat extraction and ancillary activities at the Application Site are subject to the conditions associated with IPC Licence P0499-01. Peat extraction ceased at the Application Site in 2017, and decommissioning activities as required by Condition 10 of the IPC Licence are currently ongoing. Subsequent to the completion of decommissioning activities, rehabilitation works will commence at the Application Site. A full description of decommissioning and rehabilitation activities is provided in Chapter 4 - Description of the Development, Volume 2.

### 2.1 Statement of Authority

This chapter of the rEIAR has been prepared by Evan Rossiter and Jim Hughes of Fehily Timoney and Company, and Emma Cross and Margaret Gleeson of BnM.

Evan is a Senior Project Planner with a BSc in City Planning and Environmental Policy and a Masters in Regional and Urban Planning (MRUP) from University College Dublin. Evan has 4 years' experience and has prepared EIAR Chapters for a range of development types, including renewable energy developments, throughout Ireland.

Jim Hughes holds a BA in Public Administration from the University of Limerick, an MSc in Town Planning from Queen's University Belfast and a Higher Diploma (H.Dip) in Environmental Impact Assessment from University College Dublin and has over 20 years of experience. Jim has led major Irish projects in the planning, environmental assessment and permitting disciplines including many wind farm developments.

Emma Cross is a Planning Programme Manager in BnM with over 8 years' experience in the environmental and planning sector. Emma has contributed to and co-ordinated the preparation of EIAs and technical reports for projects across a wide range of development including projects in the energy, natural resources, industrial and residential sectors. Emma holds a BA Natural Science awarded by Trinity College Dublin, an MSc Environmental Sustainability from University College Dublin and an Advanced Diploma in Planning and Environmental Law awarded by the Honorable Society of King's Inns.



Margaret Gleeson (BnM) holds a B.Sc. Hons in Earth Sciences and an MSc in Sustainable Energy and Green Technologies from University College Dublin. She has almost 7 years' experience in the environmental and consulting sectors, predominantly as an EIA specialist, with experience in impact assessment and associated technical reporting across various projects.

## 2.2 Historical Background of Peat Extraction

This section provides a background to the history of the peat industry in Ireland and the development works which have taken place at the Application Site since the 1940s. Peatlands have long played an important cultural and economic role in Ireland, certainly long before the establishment of Bord na Móna in 1946. Evidence shows that peatlands have been exploited as a fuel resource for well over a thousand years. Indeed, by the 17th century, turf had been established as a major fuel source across Ireland<sup>1</sup>.

By the 18th century, as urban centres, particularly Dublin, began to grow, turf cutting to satisfy growing fuel demands began on a large scale on bogs within economical reach. This was aided by the extension of the Grand Canal, which served as a major transport route for turf to Dublin, through the Bog of Allen as far as Monasterevin, Co. Kildare in 1786. During this time, the policy of the Irish Department of Agriculture and the Board of Trade appeared to prioritise agriculture as Ireland's sole industry, leading to a discouragement of peat fuel development due to concerns about potential competition with British coal. Surveys of peatlands were undertaken by the Bog Commissioners in the early 1980's, which culminated in their publishing a series of four reports between 1810 and 1814, which examined the major bogs of Ireland specifically in relation to their suitability for use in agriculture.

The Dublin Society had been actively promoting the drainage of peatlands from 1731 onward to facilitate their reclamation and repurposing as agricultural lands, with the British parliament also supporting this effort, with numerous bills presented between 1823 and 1875 following the publication of the Bog Commissioners reports. However, by the late 19th and early 20th centuries, there was a shift in emphasis towards promoting the development of Irish peatlands for fuel purposes and enhancing the quality of turf as a fuel source.

The peat industry, prior to the establishment by the Government of the Turf Development Board Ltd., which later became Bord na Móna (as discussed below), was largely underpinned by private enterprises and operators. In 1919, the Dáil established a National Commission of Enquiry into the Resources and Industries of Ireland, which in 1921 produced a report on the use of peat for power generation. This report recommended experimenting with the use of peat for electricity and the acquisition by the State of all the large bogs in the country<sup>2</sup>. Interest in peatlands as a fuel resource continued, and in the early 1930s during their election campaign, Fianna Fáil made promises to the public to develop the bogs.

In 1933, C.S. 'Todd' Andrews was appointed to the Department of Industry and Commerce to implement a scheme which would focus on the stimulation of private turf production, establish minimum standards for turf produced, fix prices, and organise distribution<sup>3</sup>. With the assistance of the Irish Agricultural Organisation Society, some 180 co-operative turf societies were formed to facilitate this scheme. Due to the complexities associated with managing the scheme, C.S. Andrews advocated for the streamlining of the management of national peat resources, and succeeding in persuading Government to establish the Turf Development Board Ltd.

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<sup>1</sup> Feehan, J., O'Donovan, G. (1996). "The Bogs of Ireland: An Introduction to the Natural, Cultural and Industrial Heritage of Irish Peatlands." University College Dublin

<sup>2</sup> Ryan, H., Figgis, D., Connolly, J., Dillon, T., Moore, M., O'Shea, J. P., Sweetman, R., Tweedy, R. N. & Walsh, H. 1921. Report on Peat, Commission of Enquiry into the Resources and Industries of Ireland, pp. 4, 32, 35-38, 78. Dublin

<sup>3</sup> Andrews, C. S. 1982. Man of no Property, The Mercier Press, Cork



## 2.3 The Turf Development Board Ltd.

The Turf Development Board Ltd ('TDB') was established in 1934 as a state-owned company financed by the exchequer, tasked with the development of peatlands. The identification of suitable peat extraction sites began in 1935, when the TDB began a systemic survey of all Irish bogs. The surveys of the bogs by the TDB built on the knowledge presented in the aforementioned Bog Commissioners reports, which provided an excellent starting point for the surveys of bogs suitable for peat extraction. From 1935 to 1937 some 13 initial surveys were carried out and over the next 17 years some 625 separate surveys were done to build an expansive knowledge of peatlands and allow informed decisions to be made with regards the selection of sites for peat extraction.

The Turf (Use and Development) Act 1936 (hereafter 'the 1936 Act') was subsequently passed by the Dáil in June 1936. One of the more significant provisions of the 1936 Act was Section 22(1) which gave the Minister power to acquire land required for the Turf Development Board's operations (i.e. 'production, the preparation for sale, or the storage of turf, or any purpose ancillary to such production, preparation, or storage') by compulsory purchase. In the same year, the Board acquired Turraun Bog in Offaly and purchased large bogs in Clonsast, Laois, and Lyrechrumpane, Kerry. These bogs were drained and prepared for mechanised use with German "Baggers". Additionally, a peat briquette factory began operations in Lullymore, Co. Kildare in 1936, initially supplying priority industries and the railway network.

## 2.4 The War Years and the Need for Indigenous Fuel

The utilisation of peat as an indigenous fuel resource, as facilitated by the 1936 Act, came into prominence during the Second World War as a consequence of depleted coal reserves within the UK. These depleted coal reserves resulted in a shortage of imported coal into Ireland, on which energy production was largely dependent, which drove the impetus to increase our national fuel independence and security of energy supply using peat. In 1941, Hugo Flinn T.D. was appointed as Turf Controller, with a remit of overseeing the production of native fuels.

Flinn established the Turf Emergency Committee, the findings from which informed the establishment by the Government of four major projects aimed at promoting the production and distribution of turf, namely by:

- Encouraging private turf production (the TDB handled publicity and marketing associated with this endeavour);
- Establishing County Council production schemes, in which County Councils took responsibility for the production of turf, with the assistance of powers bestowed on them by the Government to compulsorily acquire, work and let turf banks;
- Acquiring bogs and other lands in a scheme which became known as the 'Kildare Scheme'. The Kildare Scheme involved the crash development of c. 24,000 acres of bog, as well as the building of fourteen residential camps to house workers developing peat resources; and,
- Producing machine turf, briquettes and hand-won turf on TDB bogs.

The implementation of these Government projects during the Second World War ensured that Ireland had continuity of energy supply, at a time when the fuel imports on which the country so heavily relied, dwindled.



## 2.5 Establishment of Bord na Móna and the First Development Programme

Following the Second World War, the Irish State was keen to continue to develop indigenous fuel resources to increase national energy security, particularly in the event that imported fuels were ever scarce again. The TDB were asked of the Government to devise a programme to develop the country's bogs. The initial result of this was the transformation of the TDB into Bord na Móna, which was established as a statutory authority responsible for the 'development of the nation's peat resources' under the Turf Development Act 1946 ('the 1946 Act'). The functions of Bord na Móna, as per Section 17(1) of the Act, are as follows:

- a) To produce and market turf and turf products;
- b) To foster the production and use of turf and turf products;
- c) To acquire bogs and other lands;
- d) To manage, develop and work bogs and other lands vested in the Board [Bord na Móna]; 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.

At this time, the Government issued a White Paper which set out a comprehensive plan for the development of the country's peat resources by mechanical methods, and which would also consequently reduce the country's reliance on imported fuel, while also providing substantial employment. This White Paper later became known as the First Development Programme. The principal proposals of the First Development Programme were as follows:

- The development of 24 no. bogs for peat extraction;
- The improvement of Lullymore Briquette Factory;
- The erection of a peat moss litter factory at Kilberry;
- The establishment of a Government-funded peat research station; and,
- The building of Portarlinton, Allenwood, and Lanesborough peat-fired power stations.

The First Development Programme also outlined policies which underpinned the Government's commitment to developing the national peat resource for energy production, namely that new projects for the production of electricity were to be based on the use of turf, that all public or state-assisted housing in turf-producing areas were to have appliances suitable for burning turf, that all institutions built by local authorities were to have boilers capable of burning turf, and that any factories in turf-producing areas receiving government grants would be obliged to install turf-burning equipment.

By 1946, Bord na Móna employed 5,138 workers, and several bogs were either in development or already in subject to peat extraction.



## 2.6 The Second Development Programme

In 1947, Bord na Móna proposed to the Government the doubling of the output of the ongoing First Development Programme. The proposal was well-received and resulted in the enactment of the Turf Development Act 1950 ('the 1950 Act'), effective from July 26th, 1950, which empowered Bord na Móna to broaden its scope of operations. This legislation marked the beginning of the Second Development Programme. Plans were made for expanding activities to achieve a capacity of two million tonnes of machine sod turf annually as well as the construction of five additional power stations at Ferbane, Rhode, and Shannonbridge Co. Offaly, Bellacorick, Co. Mayo, and Unit 2 of Lanesborough Power Station, Co. Longford.

Furthermore, under Section 5(1) of the 1950 Act, Bord na Móna was granted the authority to build housing for its permanent workforce. Nine housing schemes, totalling 582 houses, were proposed to the Minister of Industry and Commerce for approval, with site development work commencing in 1951.

In the early 1950s, discussions between Bord na Móna and the Electricity Supply Board ('ESB') focused on expanding turf usage for electricity generation. They also considered the potential of milled peat as a boiler fuel for power stations. By 1952, Bord na Móna began supplying turf to the ESB's Allenwood station and identified suitable bogs for further development. In subsequent years, milled peat extraction started in the Boora bogs to fuel the planned Ferbane and Lanesborough power stations.

The Second Development Programme resulted in a significant increase in peat production output with 15 no. bogs coming into production between 1955 and 1959. Notably, Bord na Móna prepared for the construction of a milled peat power station in Bellacorrick, Co. Mayo, and development continued for the Shannonbridge station. Significant investments were also made in infrastructure, such as railways and roads within bog areas, as well as machinery development, to improve the efficiency and safety of peat extraction and transportation. By the late 1960s, Bord na Móna's operations had significantly increased, supplying seven ESB power stations. The company was also running three briquette factories and two horticultural peat factories, and the area of bogs allocated for energy, fuel, and horticultural peat production had notably expanded.

As outlined in Section 2.2, Lullymore Briquette Factory commenced production of peat briquettes in 1936. The primary focus of the First and Second Development Programmes was the development of turf- and peat-fired power stations to produce energy for national consumption. These endeavours were supported by forecasted steady demand for electricity through the 1950s and beyond. However, in 1956 the ESB revised their demand models, forecasting a levelling out in electricity demand, with then-current power stations generating surplus electricity. As a result, the ESB confirmed that no additional generating stations would be required for the foreseeable. This was deeply problematic for Bord na Móna; bogs on which development had commenced to produce peat to fuel the then-prospective power plants was already well underway, with hundreds of men activity employed on these bogs alone. With no new generation to fuel, these jobs were under severe threat. In order to avoid mass layoffs of skilled staff, a new source of demand needed to be found.



Building on the learnings of the operation of Lullymore Briquette Factory, and combined with the huge popularity of the briquettes produced there, Bord na Móna began to devise plans to develop a number of other briquette factories, and in May 1956 sought approval from the Department of Finance to develop two new briquette factories at Derrinlough and Croghan, both in County Offaly. This approval was initially refused by Government, owing to an unavailability of the required £1.8 million capital funding and a belief that there was no large-scale market for briquette production. With hundreds of jobs at risk, funding was partially secured for these briquette factories from an unexpected source; keen to support the rural economy in Ireland, Sir Hugh Beaver, Managing Director of Guinness, made an offer of a loan to Bord na Móna to assist in the building of these factories. The first formal loan offer of £500,000 was made by Guinness in November 1956, and in the same month, Government approved the proposal to construct the factories. Guinness provided a further loan of £250,000 in July 1958 towards the development of the factories, with these loans repaid by Bord na Móna over the period to December 1972. Construction commenced on Derrinlough Briquette Factory in 1957, and on Croghan Briquette Factory in 1958. Briquettes became so popular as a fuel and demand was such that chronic shortages became prevalent, and allocation systems were introduced to control supply.

## 2.7 The Third Development Programme

The growing need for resources to supply the country's peat-fired power stations, and the later oil crisis emerging in the 1970s, highlighted the importance of indigenous fuel resources, and furthermore, Bord na Móna's role in supporting the provision of a robust power system. Peat emerged as a cost-effective alternative to other fuels during this period of hardship, prompting the government to request investments from Bord na Móna. In response, the Turf Development Act of August 1975 increased the company's capital borrowings to £60 million, facilitating the implementation of the Third Development Programme. This programme involved purchasing approximately 30,000 additional hectares of land and investing £164 million, including plans for expanding peat generating capacity and constructing new briquette factories.

By 1980, significant progress had been made in drainage and development works on about 17,000 hectares of the acquired land. The majority of these works related to the extension of its existing operations and the expansion of horticultural peat production. For example, growing demand for packaged sod peat in polythene bags led to a bagging plant being constructed and commissioned at the Ballivor Works between 1969-70. Bord na Móna became a vital contributor to Ireland's social and economic landscape, employing approximately 7,000 workers at its peak. Major civil works were carried out to extend the railway network and associated infrastructure, supporting the expansion of operations and horticultural peat production.

However, despite the increased utilisation of peat, the Third Development Programme faced financial challenges as it relied on high oil prices, which did not materialise. Additionally, the emergence of natural gas from Kinsale in 1979 and the Private Turf Development Act of 1981 led to shifts in consumer preferences towards more efficient fuels and encouraged private development of smaller bogs. Consequently, Bord na Móna's market share decreased, leading to the decision to construct only one new briquette factory in Littleton, Co. Tipperary.



## 2.8 After the Third Development Programme

By the late 1980's, Bord na Móna faced challenges as high-cost producers in an already costly industry. Falling energy prices exacerbated the situation, along with adverse weather conditions, particularly in 1985 and 1986. The company's milled peat harvest in 1985 fell short of the target by 39%, leading to the difficult decision to lay off 2,300 employees by the end of August 1986. However, favourable weather in late autumn allowed for an unexpected extension of the harvesting season, resulting in 45% of the annual target being achieved during that time. Ultimately, the year's total harvest reached 78% of the target, largely due to the determination of the employees. This success prompted the company to proceed with only 350 layoffs, mostly on a voluntary basis, based on improved financial forecasts.

From 1989 to 1993, Bord na Móna implemented a rationalisation program aimed at reducing high production costs and boosting productivity. Various cost-cutting initiatives were introduced across all company operations. In the financial year 1988/89, staff costs amounted to £59.1m out of a total operating cost of £100m. Significant workforce reductions were made, and a new system called Autonomous Units was implemented, where workers were paid based on output and efficiency, resulting in productivity gains. However, around 3,500 jobs were lost during this process. Additionally, the company underwent divisionalisation in April 1989, with separate divisions established to operate autonomously, aligning the company's focus more closely with market demands and customer needs.

A key outcome arising from this rationalisation process was the commitment to secure the continued use of peat within Ireland's energy mix. In June 1993, a feasibility study for a proposed peat-fired generator ('Europeat 1' - Edenderry Power Plant) at Edenderry, Co. Offaly was submitted to the Minister for Transport, Energy and Communications, and in April 1995, an agreement was reached with the European Commission on the provision of financial support for the proposed 120MW power plant. The Ballydermot Bog Group and Derrygreenagh Bog Group were identified as the primary supply bogs for the power plant. Construction of the Edenderry Power Station was commenced in January 1999 and was commissioned for operation in December 2000.

## 2.9 Development at the Application Site

This section of the rEIAR sets out the operational history of Bord na Móna at the Application Site specifically.

### 1940s Development

The Turf Development Board meeting minutes from the 1940s show that Littleton Bog was proposed for acquisition in June 1940 and this proposal was approved by the Department of Industry and Commerce on the 1st of April 1941. Minutes from 30th of September 1941 show the Board ordering the commencement of drainage at the new bogs, subject to completion of acquisition.

The Annual Report for the year ending 31st of March 1945 listed Littleton as being under preliminary development. In 1946, work was commenced on hostels for the workers at Littleton and were completed in 1948. The erection of power lines was completed on the bog by the year ending 31st of March 1950.

### 1950s Development

As discussed in Section 2.1.3, the increasing consumption of electricity in the post-war period led Bord na Móna in 1950 to embark on a Second Development Programme. This provided for further increases in sod turf production and also introduced major targets for a more mechanised form of peat production - milled peat. The production of 174,000 tonnes of sod peat and 2,290,000 tonnes of milled peat per annum was envisaged under this programme. It was expected to achieve these outputs by 1960.



The Annual Report for the year ended 31st March 1951 states that cutting machines intended to deepen the drains prior to the commencement of production on Littleton. The Annual Report year ended 31st March 1951 shows that Littleton Bog was listed for development under the programme (also known as the Second Post War Plan).

Annual Report year ended 31st March 1952 shows that machine turf was produced at Littleton Bog. Expenditure on bog development work at Littleton (drainage, machines, buildings, engineering supplies, overhead expenses, lands) is also shown during the same financial year (p.75).

In the 1952-53 Annual Report, it is noted an extension of Littleton Bog was under preliminary development. Expenditure at Littleton is shown on drainage, buildings, railways, engineering supplies, overhead expenses, and lands (Annual Report year ended 2nd April 1953, p.129a).

The Annual Report year ended 1st April 1954 shows that the Littleton extension is still under preliminary development (p.129). For the year ended 1st April 1954 the preliminary development balance sheet shows expenditure at Littleton Bog on drainage, buildings, railways, engineering supplies, overhead expenses, and lands (p.129a).

Annual Report year ended 31st March 1955 states that; "Drainage in preparation for machine turf production was carried out at Garrdha Inse, Co. Leitrim, Miolcarnach, Co. Westmeath, Breaclach, Co. Meath, Liath Manchain and Sineadh Cluain Sosta, Co. Offaly, Sineadh Ait Tigh Mona, Co. Galway and at Sineadh Baile Dhaith and Teampall Tuaithe, Co. Tipperary."

By 1955-56, drainage work in preparation for sod peat production continued at Littleton; "Drainage work in preparation for sod peat production continued at Garrdha Inse, Co. Leix, Miolcarnach, Co. Westmeath, Breaclach, Co. Meath, Liath Manchain and Sineadh Cluain Sosta, Co. Offaly, Sineadh Ait Tigh Mona, Co. Galway, and Sineadh Baile Dhaith, and Teampall Tuaithe, Co. Tipperary." (Annual report year ended 31st March 1956, p.13).

Annual Report year ended 31st March 1958 states; "Work proceeded on the sod peat development bogs and drainage is approaching the final stages. At Breaclach, Co. Meath, Teampall Tuaithe, Co. Tipperary; Carraig Cheannan, Co. Dhaith 2, Co. Tipperary and Ait Tigh Mona 2, Co. Galway, machine turf was produced as an aid to drainage Kerry; Baile" (p.13).

## **1960s Onwards**

The Annual Report for the year ending 31st March 1964 indicates that development works were expanded at Littleton Bog by acquiring additional acreage. The report states that; "It was decided to extend the Board's operations in the Baile Dhaith and Teampall Tuaithe areas, Co. Tipperary by acquiring a further 1,200 acres with a potential annual output of 30,000 tons of machine turf." (p.11).

The Annual Report for the year ending 31<sup>st</sup> March 1965 states that drainage work commenced on an area of the previously acquired 1,200 acres.

The Annual Report for the year ending 31<sup>st</sup> March 1970 states that "a pilot plant for the packaging of sod peat in polythene was installed" at Littleton. (p.13).

The Annual Report for the year ending 31<sup>st</sup> March 1978 states that "site development and construction work for the new Littleton Briquette Factory commenced" (p.8). Construction on the Littleton Briquette Factory was completed in 1980. Yard drainage pumps were installed at Littleton Briquette Factory in 1985.



## 2.10 Littleton, Longfordpass, Lanespark and Derryvella Bogs – Operational History

The development of the Application Site commenced in 1941 during the First Development Programme. Table 2-1 below summarises the peat extraction timelines at the Application Site.

**Table 2-1: Littleton, Longfordpass, Lanespark and Derryvella Bog peat extraction timelines taken from Annual Reports as described in Chapter 4 - Description of the Development, Volume 2 of this rEIAR**

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

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

BnM 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, as detailed in Chapter 4 - Description of the Development, Volume 2, of this rEIAR. 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. Further details of estimated peat extraction volumes from 1952 to July 1988 is provided in Section 4.3 of Chapter 4 - Description of the Development, Volume 2, of this rEIAR.

Milled peat extraction continued on the Application Site during the Peat Extraction Phase, and BnM 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. Further details of estimated peat extraction volumes for the Peat Extraction Phase are provided in Section 4.6 of Chapter 4 - Description of the Development, Volume 2, of this rEIAR.

Industrial scale peat extraction ceased at the Application Site in 2017. BnM 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, as discussed further below in Section 2.2.4.

During the Current Phase, the operations at the Application Site have reduced to the removal of stockpiled peat which was completed by mid-2019.

## 2.11 Site Planning History

There have been a range of planning applications lodged for developments which are either within the overall footprint of the Application Site, or are adjacent to the Application Site, not all of which are associated with peat extraction and ancillary activities at the Application Site. Table 2-2 lists all of the valid applications within or adjacent to the Application Site boundary.



**Table 2-2: Planning Applications adjacent to or within the Application Site Boundary**

Planning Authority	Pl. Ref	Year	Description	Planning Authority Decision
Tipperary County Council	P34576	1977	Littleton Briquette Factory	Granted
Tipperary County Council	P34921	1978	Briquette factory complex, workshops and office building	Granted
Tipperary County Council	6190	1978	Construction of underpass bridge for double line railway on Littleton Village to new Birmingham road	Granted
Tipperary County Council	6586	1978	Construction of an underpass bridge	Granted
Tipperary County Council	6848	1979	Erection of underpass bridge for double-line railway	Granted
Tipperary County Council	7511	1979	Construction of a level crossing on the new line road between Longfordpass Bridge and Castletown Bridge	Granted
Tipperary County Council	7199	1979	Construction of a level crossing for a single line railway on the Littleton to Ballinunty Road	Granted
Tipperary County Council	P39214	1983	Two level crossings	Granted
Tipperary County Council	11389	1985	Construction of a single rail line level crossing	Granted
Tipperary County Council	P39788	1985	Relocate bailing house at existing briquette factory	Granted
Tipperary County Council	991431	1999	Retention of extension for fire lighter manufacturer and storage and bund area	Granted



Planning Authority	Pl. Ref	Year	Description	Planning Authority Decision
Tipperary County Council	20802	2020	The erection of a guyed wind monitoring mast, with instruments, up to 100m in height - the purpose of the proposed mast is to assess the suitability of the company's adjacent lands for wind farm development	Granted
Tipperary County Council	2560154	2025	a recreational shared cycle and walkway to connect into the existing Loch Dhoire Bhile Loop - a) the delivery of a shared cycle and walkway on Bord na Móna lands. This will include the repurposing of 602 meters of existing former rail bed, 2859 meters along existing bog headlands / former high fields, and 721 meters along pre-existing machine access routes, b) the construction of car and / or bicycle parking facilities at a number of gateway locations along the proposed route and the provision of EV charging spaces at the gateway locations. This will include; i. 2 no. Type 2 Gateways, ii. 1 no. Type 4 Gateway, iii. 1 no. Minor Rest Points, c) Upgrade works to 1 no. local access road crossing and 4 no. agricultural access crossings, d) the erection of wayfinding and interpretative signage at Gateway locations along the route, e) the implementation of Sustainable Drainage Systems (SuDS) nature-based drainage proposals at the Gateway locations to cater for surface water drainage at car park locations, f) fencing and screening will be erected where required for health and safety and biodiversity reasons which will include 2250 meters of screening and 1925 meters of boundary treatment fencing, g) all other ancillary and associated site work. This Planning Application is accompanied by a Natura Impact Statement (NIS)	Granted

It should be noted that some of the planning applications listed above in Table 2-2 do not have any connection with the licenced peat extraction and ancillary activities undertaken within the Application Site. These developments have been considered within the cumulative assessment carried out as part of the rEiAR and rNIS.



## 2.12 Planning History of Peat Extraction at the Application Site

Industrial-scale peat extraction was on-going within the Application Site prior to July 1988, before the required transposition of the EIA Directive and Habitats Directive, with peat extraction commencing in 1952 within the Application Site. Peat extraction activities, which were within the definition of ‘agriculture’ with regard to turbary, were classified as exempted development under Section 4(1)(a) of the Local Government (Planning and Development) Act 1963, and this exemption was generally continued under Section 4(1)(a) of the Planning and Development Act, 2000 (‘the Act’), which stated the following:

*“4.-(1) The following shall be exempted developments for the purposes of this Act –*

*(a) Development consisting of the use of any land for the purpose of agriculture and development consisting of the use for that purpose of any building occupied together with land so used”*

It should be noted however, that the 1963 Act included the use of the land for turbary within the definition of Agriculture, while the Act, 2000 did not. The Planning and Development Regulations 2001 (as amended) (“the Regulations”) include exemptions for certain classes of peat extraction Class 17, Part 3 (Schedule 2) refers:

Class 17 (Part 3, Schedule 2)

- a) Peat extraction in a new or extended area of less than 10 hectares, or
- b) Peat extraction in a new or extended area of 10 hectares or more, where the drainage of the bogland commenced prior to the coming into force of these Regulations.

The provisions of Class 17 (Subpoint b) remained relevant to the peat extraction and ancillary activities undertaken at the Application Site due to the historic nature of the drainage activities on site. The enactment of the Environment (Miscellaneous Provisions) Act 2011 on the 20th of September 2012, inserted Section 4(4) into the Act<sup>4</sup>,

*“Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.”*

Prior to the enactment of the Environment (Miscellaneous Provisions) Act 2011, Westmeath County Council referred a Section 5 Declaration of Exemption (S5-24-11) to An Coimisiún Pleanála on the 2nd of February 2012 concerning whether the drainage of boglands, peat extraction, accesses from public roads and peat handling activities at another site at Lower Coole, Mayne, County Westmeath was or was not development and whether it constituted exempted development (An Coimisiún Pleanála Ref. RL2975).

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<sup>4</sup> Section 4(4) did not apply to development “completed not later than 12 months after such commencement”



An Coimisiún Pleanála concluded that the on-going development (i.e. the continuation of works to extract peat) on the subject site remained exempted development as per the adoption of The Act, despite the omission of the reference to turbarry in Section 2 of the Act, by virtue of Article 11<sup>5</sup> of the Planning and Development Regulations 2001 and regardless of whether an EIA or AA is required. However, an Coimisiún Pleanála then went on to consider whether the ongoing extraction of peat (that was not completed by the 21st of September 2011<sup>6</sup>) and which formed part of the Section 5 referral<sup>14</sup> to an Coimisiún Pleanála would need EIA and/or AA in the context of Section 4(4) of the Act (which had been inserted during the consideration RL.2975). An Coimisiún Pleanála ultimately concluded that:

*“because the development involved in continued works to extract peat from the site requires an Environmental Impact Assessment and Appropriate Assessment then, notwithstanding Article 11 of the Planning and Development Regulations 2001, any such works on or after the 20th day of September 2012 is not exempted development by virtue of section 4(4) of the Planning and Development Act, 2000, as inserted by section 17 of the Environment (Miscellaneous Provisions) Act 2011”*

An Coimisiún Pleanála’s decision on RL.2975 broadly established the precedent that the drainage of boglands and extraction of peat was development and not exempted development with regard to Section 4(4) of the Act. Westland Horticulture Limited and Bulrush Horticulture Limited were granted leave to seek judicial review to apply for an order of certiorari for quashing an Coimisiún Pleanála’s decision on RL.2975 on the basis, inter alia, that the extraction of peat was a ‘use’, rather than works, and therefore, the development / works required to facilitate this use would have been completed ‘not later than 12 months after such commencement’ and peat extraction (as a use) should continue to be exempted development (*Westland Horticulture Limited and Bulrush Horticulture Limited v An Bord Pleanála* [2018] IEHC 58).

This argument was ultimately rejected by Mr. Justice Meenan in his judgment (February 2018) in which he held that peat extraction was both works and use and, as peat extraction involving a new or extended area of 30 hectares or more required EIA (Schedule 5, Part 2, Class 2a of the Regulations), planning permission was required. This decision was subject to an application for leave to appeal, which was refused on 7th December 2018, and consequently, an Coimisiún Pleanála’s decision on RL.2975 was upheld by the High Court. As established by RL.2975 and the subsequent High Court judgment in *Westland Horticulture Limited and Bulrush Horticulture Limited v An Bord Pleanála* [2018] IEHC 58, the need for EIA and/or AA effectively de-exempts peat extraction over 30 hectares due to the provisions of Section 4(4), and therefore, planning permission is required.

Following the High Court judgment in *Westland Horticulture Limited and Bulrush Horticulture Limited v An Bord Pleanála* [2018] IEHC 58, the ‘Peat Regulations’ were enacted in January 2019, which consisted of two pieces of legislation<sup>7</sup> that provided for an exemption from planning permission for large scale peat extraction activity (30ha or over) and the introduction of a regulatory framework (to include both EIA and AA) for these developments to be operated by the EPA within its activity licensing regime.

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<sup>5</sup> Article 11 of the Planning and Development Regulations 2001 (as amended): “Development commenced prior to the coming into operation of this Part and which was exempted development for the purposes of the Act of 1963 or the 1994 Regulations, shall notwithstanding the repeal of that Act and the revocation of those Regulations, continue to be exempted development for the purposes of the Act.”

<sup>6</sup> This being the date Section 17 of the Environment (Miscellaneous Provisions) Act 2011 came into force – S.I. No 474/2011 changing Section 4 of the Act.

<sup>7</sup> European Union (Environmental Impact Assessment) (Peat Extraction) Regulations 2019, and Planning and Development Act 2000 (Exempted Development) Regulations 2019.



The 'Peat Regulations' were subsequently challenged<sup>8</sup>, and ultimately quashed, by Mr Justice Simons by way of his judgment on 20th September 2019, and the following Order (18th October 2019) on the basis that they were invalid on the grounds that the legislation was inconsistent with the requirements of Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (amended by Directive 2014/52/EU of 16 April 2014) (the EIA Directive) and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the use of secondary legislation to give effect to the new licensing regime under the EPA was ultra vires. With regard to Class 17 and the introduction of Section 4(4) as discussed above, it is important to highlight the observation of Justice Simons within his consideration of *Friends of the Irish Environment Ltd v Minister for Communications, Environment & Climate Action & Ors.* [2019] IEHC 646:

*“One of the curious features of the approach initially taken to peat extraction under domestic legislation is that a distinction had been drawn between existing peat extraction, and peat extraction involving “new or extended” areas. Although not stated in express terms, the assumption underlying the legislation seems to have been that existing peat extraction did not have to comply with the EIA Directive. In order to benefit from this special treatment under domestic law, all that was necessary was that the drainage of the bogland had commenced prior to the coming into force of the relevant parts of the Planning and Development Regulations 2001 on 21 January 2002. Thus, it was not necessary even that the peat extraction had commenced prior to the implementation date for the EIA Directive on 27 June 1988.”*

The observation of Mr Justice Simons on the interpretation of previous planning law for peat extraction activities is insightful in reflecting the ambiguity of the regulating framework for this type of activity pre-2012 / 2013.

In the interim, the Applicant had continued with the established industrial scale peat extraction in line with the conditions of its IPC Licence (Ref. P0499-01). Peat extraction ceased at the Application Site in 2017.

On foot of *Friends of the Irish Environment Ltd v Minister for Communications, Environment & Climate Action & Ors.* [2019] IEHC 646, the Applicant ceased peat extraction on all peatlands within its management in January 2021, though peat extraction ceased at the Application Site in 2017. The Applicant proceeded to prepare and lodge an application seeking leave to apply for substitute consent for Littleton, Longfordpass, Lanespark and Derryvella Bogs in March 2023 (ACP Ref. 316033) to regularise peat extraction and ancillary activities carried out at the Application Site, and to facilitate appropriate future uses.

Following the enactment of the Amendment Act in December 2023, the substitute consent process changed from a two-step to a one-step application process i.e. the leave stage was removed. The pending leave application was subsequently deemed withdrawn by the Applicant by An Coimisiún Pleanála on 15<sup>th</sup> January 2024 in accordance with the Planning and Development, Maritime and Valuation (Amendment) Act 2022 (Commencement of Certain Provisions) (No.2) Order 2023.

As a result, substitute consent is now 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 that were undertaken at the Application Site from July 1988 onwards, as described in Section 1.4 of Chapter 1 - Introduction, Volume 2. Further detail on the Project description is included in Chapter - 4 Description of the Development, Volume 2.



It has been established by the Court of Justice of the European Union in Case C-215/06 *Commission v. Ireland* [2008], that “substitute consent” is only permitted in exceptional cases. The judgment of the Supreme Court in *An Taisce v. An Bord Pleanála* [2020] I.E.S.C. 39 found that Sections 177C(2)(a) and 177D(1)(a) of the Planning & Development Act 2000 (as amended) (“the Act”) were inconsistent with the EIA Directive, as interpreted by the Court of Justice, in that they failed to provide adequately for the exceptionality test as demanded by that Court.

The Act has been amended to make adequate provision for the exceptionality test<sup>9</sup>. Accordingly, Section 177K(1A) of the Act requires that, in any given case an Coimisiún Pleanála must be satisfied that exceptional circumstances exist that would justify the grant of substitute consent.

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

### 2.13 Integrated Pollution Control Licence (IPC) Licence (Ref. P0499-01)

Bord na Móna is currently the only operator licenced by the Environmental Protection Agency (EPA), as per Part IV of the Environmental Protection Agency Act 1992, to carry out the extraction of peat in an area exceeding 50 hectares. Bord na Móna was granted its Integrated Pollution Control Licence (IPC) Licence (Ref. P0499-01) from the EPA for the Littleton Bog Group, within which the Application Site is located, in addition to a number of other bogs located in Co. Tipperary in 2001. The EPA issues licences that contain strict conditions on how an activity must operate so as to protect the environment from pollution that might otherwise arise. The EPA Act, 1992 specifically prohibits the EPA from granting a licence if emissions from an activity would cause pollution.

The EPA has undertaken Technical Amendments of the licence on 25th September 2012 for the purpose of aligning the operational conditions of the licence to the objectives of National and European environmental protection legislation enacted over the lifetime of the licence. The current IPC Licence contains 15 no. conditions relating to operation and monitoring, emissions to water and air, water protection, waste management and bog rehabilitation. The IPC Licence is managed by the Bord na Móna’s Environmental Management Department in Land and Habitats, with Compliance Officer managing the day-to-day compliance requirements.

As per Condition 2 (Management of the Activity) of the IPC Licence, Bord na Móna is required to maintain an Environmental Management System (EMS) which fulfils the requirements of the licence and any associated objectives / targets relating to use of cleaner technology, cleaner production and the reduction and minimisation of waste. The EMS is required to form part of the Annual Environmental Report (AER), which details Bord na Móna’s annual record of compliance with the terms of its licence, which is generally submitted to the EPA prior to 31st of March of each year. All AERs 2002-2024 can be found in Appendix 4-3, Volume 3, of this rEIAR (2018 to 2024 are available to view on the EPA’s web portal) and have been submitted in compliance with the conditions set out within IPC Licence P0499-01. The EPA’s online web facility provides further opportunities for the public to observe records relating to the on-going licenced operations and associated assessments (the public can also make observations/complaints directly to the EPA in relation to any licenced activities) The most recent AER submitted by Bord na Móna was the AER for 2025 and covers the 2024 calendar year.

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<sup>9</sup> 1 Planning and Development, and Residential Tenancies Act 2020 introduced a number of alterations to Section XA of the Act (as amended) in relation to the substitute consent process, and in particular, the consideration of exceptional circumstances as part of the overall decision-making process



The EPA regularly audit and inspect compliance with its IPC Licences. Audits and inspections of the Littleton Bog Group were most recently conducted in February 2023 during which the EPA evaluated the licensee's compliance with the requirements of the licence and these reports are available on the EPA's web portal. These site visits were conducted as part of the EPA's site visit programme to check compliance with licence conditions.

## 2.14 Planning Policy Context

This section of the chapter outlines the planning policy relevant to the Project, including the historic planning policy (where available) that was in place at the time that the Project was carried out, along with current policy where relevant. In some cases, it has not been possible to identify the relevant policies that were in place at the time relating to the Project due to the historic nature of those policies. Where feasible, some historic policy documents have been sourced from various libraries and archives and are set out in Section 2.2.3 below.

This review and assessment conclude that the cessation of peat extraction (and proposed future uses of the Application Site) is consistent with the overarching planning policy framework with regard to achieving a climate neutral Ireland by 2050 and facilitating the promotion of proper planning and sustainable development.

### 2.14.1 National Policy Context

#### 2.14.1.1 *Climate Change Strategies*

The use of peat as a power source in Ireland is coming to a close, however for a long period of time it was the main means by which power was generated en masse. The National Climate Change Strategy (2000) states the following with respect to the use of peat as a source of electricity:

*“To the extent that peat continues to be used for power generation, its use will become more efficient with the commissioning of the new Clonbullogue plant in 2001, and the construction of two further new plants which will progressively replace all remaining, low efficiency, peat generation. These new plants will use the minimum amount of peat compatible with economic operation within the Public Service Obligation (PSO), and their construction, operation and management will be benchmarked on best industry practice to maximise the efficient use of peat” p. 33.*

Under the National Climate Strategy (2007), government policy was supportive of *“co-firing of biomass with peat in power generation as a means of reducing greenhouse gas emissions and introducing additional diversity into the fuel mix for power generation.”*

The above extracts from the National Climate Strategies demonstrate the historic favourable outlook towards the use of peat for power generation in Ireland. Peat was viewed as a key component for diversifying the fuel mix for power generation whilst supporting rural economies where this peat was being extracted.

Climate policy has since changed to reflect the latest research findings on climate change and biodiversity loss. Climate policy today focuses on renewable energy, rehabilitation and restoration and the just transition. In Ireland's most recent climate policy document, the 2025 Climate Action Plan (CAP 25), the transition away from peat and oil-fired electricity generation is notable in the 32.1% reduction in greenhouse gas emissions from the electricity sector between 1990 and 2023. The considerable impact of 'the cessation of commercial peat extraction as a feedstock for power generation' is clearly recognised by CAP 25, with Chapter 7 titled 'Delivering a Just Transition in the Midlands Region'. CAP 25 supports the continued rollout of the National Just Transition Fund which aims to 'support projects that contribute to the just transition to a low carbon, climate resilient economy of the wider Midlands region after the closure of peat-fired power stations.'. By the end of 2024, it was estimated that up to €15 million had been dispersed across 56 projects.



CAP 25 sets out a number of priorities under Chapter 7 relevant to the Application Site, which are detailed below.

**7.3.1 Priority 1:** *Generating employment for former peat communities by investing in the diversification of the local economy .*

**7.3.2 Priority 2:** *Supporting the rehabilitation and restoration of degraded peatlands and regeneration and repurposing of industrial heritage assets.*

#### 2.14.1.2 National Planning Framework – First Revision

The National Planning Framework (hereafter referred to as the ‘NPF’) was published by the Government in February 2018. The NPF has recently undergone a first revision (hereafter referred to as the ‘Revised NPF’), approved by Government on the 8th April 2025, to reflect and address the changes that have occurred in Ireland since 2018. The NPF is a 20-year planning framework designed to a focus on economic development and investment in housing, water services, transport, communications, energy, health and education infrastructure. The NPF forms the top tier of the national planning policy structure and establishes the policy context for the Regional Spatial and Economic Strategies and local level development plans.

The Revised NPF notes that in the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in Ireland. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

*“Tackle Ireland’s higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”*

The Revised NPF set out key priorities at a regional level. Specifically, key priorities for the Eastern and Midland Region include:

- *Developing the potential of the region in renewable energy terms, in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy.*
- *Building on the progress made in developing an integrated network of greenways, blueways and peatways, that will support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation utilising canal and former rail and other routes.*



Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per National Policy Objective 66, the NPF highlights the importance integrating climate action and environmental protection within the national planning decision-making process, particularly the provision of renewable energy infrastructure and protection / enhancement of carbon sinks.

- *NPO 66: The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.*

**National Strategic Outcome 8** (Transition to a Carbon Neutral and Climate Resilient Society) notes that in creating Ireland’s future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. Ireland’s national energy policy under **National Policy Objective 70** aims to ‘*Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.*’

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. Allocations are made by region for onshore wind and solar energy. The Revised NPF emphasises that rural areas, such as the Application Site, have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that “*rural areas will continue to contribute to the energy needs of the country playing a strong role in securing a sustainable renewable energy supply*”. In this regard, the NPF supports ‘*the roll-out of renewables and protection and enhancement of carbon pools such as forests, peatlands and permanent grasslands.*’

The Revised NPF highlights that some of Ireland’s cutaway bogs are “*suitable to facilitate the generation of energy, most notably wind/biomass.*”. The role of peatlands in the ‘Just Transition’ is highlighted, with a careful balance being required “*realising the potential for renewable energy development to meet sectoral emissions targets, and the management of the potential for environmental impacts in terms of the protection and restoration of nature and cultural heritage in peatlands.*”

The future uses of areas such as the Application Site is considered by the Revised NPF as a key planning and place-making priority for the Southern Region. Acknowledging the potential of these areas to facilitate specific and direct climate action measures (e.g. rehabilitation and the green energy sector), the NPF characterises Ireland’s peatlands, and the opportunities associated with their future uses including socio-economic benefits, as enabling a managed transition to low carbon economies.

#### 2.14.1.3 National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th October 2021 and sets out the major public investment projects, as identified by Government, which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the Project, climate change. It is stated that the NDP 2021 – 2030 will be the ‘largest and greenest ever delivered in Ireland’, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.



Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO<sup>2</sup> and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

*"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it. The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but rather, facilitate capital investment allocations for the climate and environmental strategic priorities. For example, the Government has committed significant financial resources, supported by carbon tax revenues, to support the Midlands region through the *Just Transition* and will continue this programme of investment in the region over the coming years. The key focus of this investment is to support the transition of the existing workforces and the creation of new enterprise and employment opportunities associated with decarbonisation in order to provide a positive and enduring social impact.

One of the NDP's strategic investment priorities associated with the *Just Transition* is the conservation, restoration and management of Ireland's peatlands and other habitats in order to reduce carbon emissions; transition the lands towards carbon sequestration and strengthening their carbon storage potential. These projects will also provide natural capital opportunities pertaining to increased biodiversity, peatland amenity and eco-system services as well as improving water quality and attenuation. Another equally important opportunity concerning the *Just Transition* and Ireland's overall decarbonisation strategy is the need to establish a low-carbon, resilient electricity systems. As established within the CAP 2021, the NDP commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an 'unprecedented commitment to the decarbonisation of electricity supplies' and will be an explicit driver for the deployment of new renewable generators and the expansion of the Irish green sector. The regularisation of the planning status of the Application Site will enable future uses to be developed, including the potential for renewable energy uses which will contribute to the increasing the share of renewable electricity up 80% as set out by the NDP.

#### 2.14.1.4 National Peatlands Strategy 2015 – 2025

The National Peatlands Strategy (NPS) was published by NPWS in 2015 and serves as a long-term strategic framework within which Irish peatlands are managed in order to optimise their social, environmental and economic contribution to the well-being of current and future generations. The NPS sets out a cross-governmental approach to managing issues that relate to peatlands, including compliance with EU environmental law, climate change, forestry, flood control, energy, nature conservation, planning and agriculture. In this regard, decisions made in peatland management can ultimately contribute to or detract from the achievement of European and national objectives and obligations, including those concerning climate change and decarbonisation.



Irish peatlands provide a range of ecosystem services, and consequently, are considered amongst the most important ecosystems of the world due to their functionality concerning biodiversity, climate regulation, water filtration and supply, and with regard to economic, amenity, heritage merits and human welfare. In recent years, scientific research has established the importance of peatlands as carbon stores and natural mitigation against some of the projected impacts of climate change. Specifically, peatlands remove carbon from the atmosphere and store it in the form of peat., and by extracting carbon over long periods and by emitting other greenhouse gases such as methane, peatlands affect and regulate the global climate. Once degraded or cutover, (i.e. industrial scale extraction,) this regulatory system is reversed, and carbon dioxide is emitted as peat decomposes (and burned as a fuel source). The role of peatlands in the carbon cycle is therefore a key consideration in their future management and will inform Ireland's response to climate change.

The NPS states that the sustainable use of peatlands, as illustrated below in Figure 2-1, will optimise the contribution of different economic, social and environmental services that peatlands provide. Relevant to the future of the Application Site, the NPS emphasises that the after uses of cutover peatlands should be undertaken in a manner that minimises environmental damage, realises opportunities regarding environmental protection and enhancement and contributes to the State meeting its objectives and obligations relating to air, climate, water, nature and the environment. These objectives are captured in General Principles P2, P3 and P18 and Action A9 of the NPS:

- *P2: The potential economic, environmental and social benefits and costs of peatland uses will be considered and applied to policy and land use decisions.*
- *P3: The future management of Ireland's peatlands will ensure the protection of threatened peatland habitats in compliance with environmental laws.*
- *P18: Environmentally, socially and economically viable options should be analysed to plan the future use of industrial cutaway peatlands, in conjunction with limiting factors as outlined in Bord na Móna's Strategic Framework for the Future Use of Peatlands*
- *A9: An examination of all publicly owned lands and privately owned cutaway will be undertaken with a view to identifying appropriate uses, which will aim to harness their potential to contribute to Ireland's environmental, ecological and economic wealth, with particular emphasis on mitigating carbon losses.*

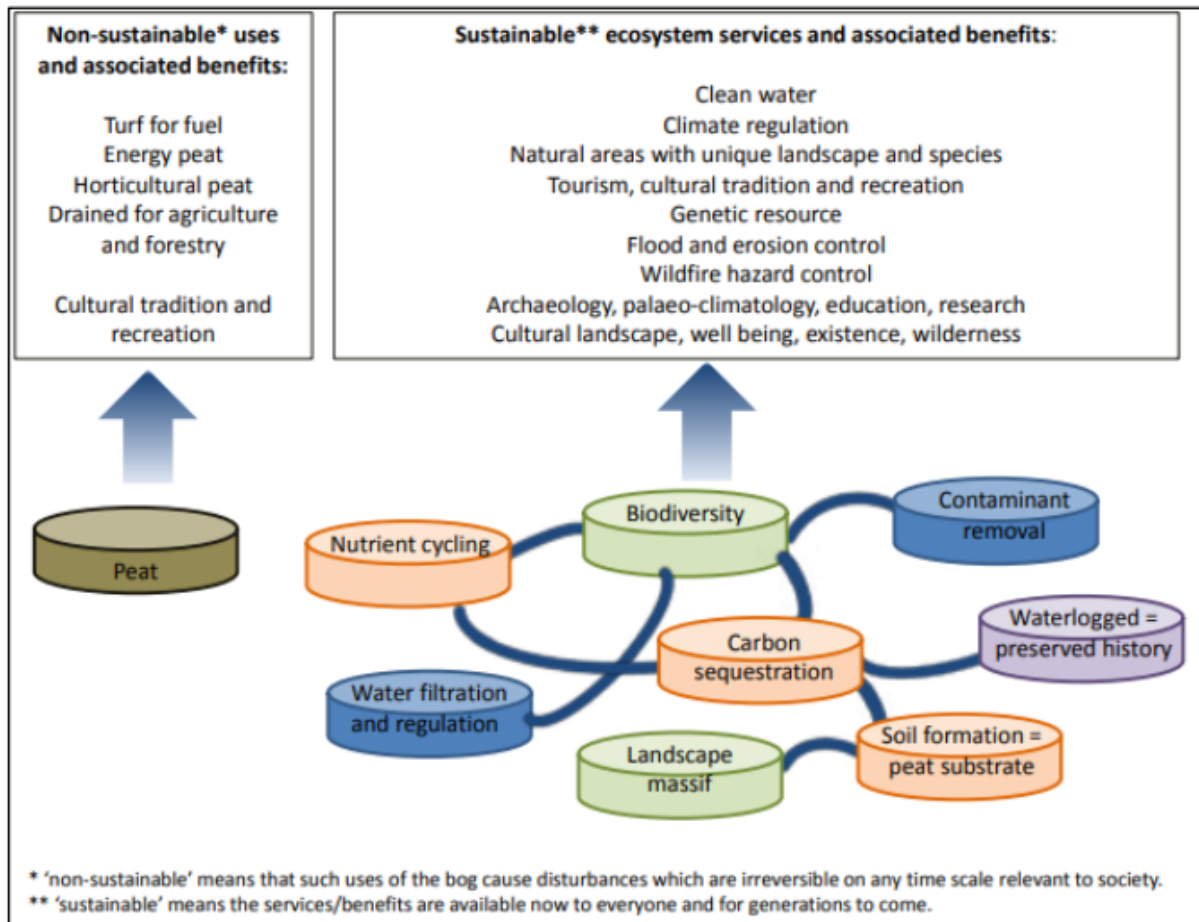


Plate 2-1: Use of Peatlands (National Peatlands Strategy 2015)

In the context of climate action, the NPS states that, in identifying the most appropriate after use for cutover peatlands, consideration should be given to encouraging, where possible, the return to a natural functioning peatland ecosystem via re-wetting. The NPS also notes that cutover bogs have a number of advantages over other categories of land in terms of accommodating potential commercial wind farm developments. The rehabilitation and potential future uses of Application Site are considered compliant with the aims of the NPS and Principles P19, P20, P21 and P24 set out below:

- *P19: The potential contribution of peatlands rehabilitation, restoration and enhancement to climate change mitigation and adaptation, in addition to peatland preservation, will be fully explored.*
- *P20: As part of Ireland's commitment to move towards a cleaner, more carbon efficient economy, means to reduce the dependency on peat as a source of fuel and horticultural compost will be fully explored.*
- *P21: Consideration will be given to how best cutaway bogs can contribute to a low carbon economy through their use as sites for renewable energy.*
- *P24: Coillte and Bord na Móna as the managers of significant tracts of peatlands on behalf of the Irish people will continue to show leadership in responsible management, rehabilitation and restoration of peatlands.*

The implementation of the Cutaway Bog Decommissioning and Rehabilitation Plans for the Application Site (see Appendix 4-2, Volume 3, of this rEiAR) has facilitated and will continue to facilitate the transition from peat extraction to peatland rehabilitation contributing to achieving the abovementioned policies.



### 2.14.1.5 Ireland's 4th National Biodiversity Action Plan 2023 – 2030

The 4th National Biodiversity Action Plan, 2023 – 2030 (NBAP) was published by the National Parks and Wildlife Service in January 2024 and establishes an over-arching Government policy comprised of objectives, targets and actions aimed to achieve Ireland's Vision for Biodiversity.

*"Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people".*

As a Party to the UN Convention on Biological Diversity, Ireland has made a commitment to prepare Biodiversity Action Plans to contribute towards the Convention's targets: secure the conservation of biological diversity; sustainable use of its components; and the equitable sharing of the benefits arising out of the utilisation of genetic resources. In order to achieve these targets, the NBAP sets out 194 no. actions under a framework of 5 no. strategic objectives:

1. Adopt a Whole-of-Government, Whole-of-Society Approach to Biodiversity;
2. Meet Urgent Conservation and Restoration Needs;
3. Secure Nature's Contribution to People;
4. Enhance the Evidence Base for Action on Biodiversity;
5. Strengthen Ireland's Contribution to International Biodiversity Initiatives.

The NBAP states that scientific research indicates that 85% of Ireland's most valuable EU-protected habitats are in an unfavourable condition. Nearly half (46%) are continuing to decline, with the most significant losses seen in marine, peatland, grassland, and woodland habitats. While the findings of the NBAP are alarming, the NBAP does recognise the progress made under the previous NBAP 2017-2021, of which one of the key achievements is listed as follows.

*'Bord Na Móna implemented restoration/rehabilitation plans for peatland habitats, with almost 30,000ha rehabilitated by March 2023'*

Under Objective Two – Meet Urgent Conservation and Restoration Needs, actions under Outcome 2C centre around the implementation of the Biodiversity Climate Change Adaptation Plan with a particular focus on peatlands rehabilitation and restoration. The actions relevant to the Application Site are listed below:

- **Action 2C1:** NPWS, Bord na Móna, DECC, DAFM, Coillte and other relevant stakeholders will implement the National Peatlands Strategy 2015-2025, and subsequent policy changes, taking account of the 2021 mid-term review;
- **Action 2C2:** Bord na Móna will develop and publish an updated Biodiversity Action Plan.

The rehabilitation of the Application Site, in conjunction with potential future uses such as renewable energy, will allow the Application Site to contribute towards the achievement of relevant climate action and biodiversity objectives.

### 2.14.2 Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development Act was signed into law in December 2015 and subsequently amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "Climate Act").



The Climate Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to, and including, the year 2050. The Act provides for a solid statutory foundation to the institutional arrangement necessary to enable the State to pursue and achieve the “national transition objective”.

The Climate Act provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and carbon neutral economy by the end of the year 2050. It establishes a legally binding framework with clear targets and commitments set in law, and embeds the necessary structures and processes on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Act significantly strengthens the framework for governance of climate action by the State in order to realise our national, EU and international climate goals and obligations.

The Climate Action and Low Carbon Development (Amendment) Act 2021, is an amendment to the Climate Action and Low Carbon Development Act 2015 and was signed into law on the 23rd July 2021. The Climate Action and Low Carbon Development Act 2015 was amended by the Climate Action and Low Carbon Development (Amendment) Act 2021, and establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

When exercising its decision-making powers under the Planning Act, planning authorities and the Commission are obliged under s. 15 of the Climate Act to:

*“in so far as practicable, perform its functions in a manner consistent with—*  
*(a) the most recent approved climate action plan,*  
*(b) the most recent approved national long term climate action strategy,*  
*(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*  
*(d) the furtherance of the national climate objective, and*  
*(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.”*

The Act embeds the process of carbon budgeting into law, with the Government required to adopt a series of economy-wide five-yearly carbon budgets to include sectoral targets for each relevant sector on a rolling 15-year basis. These five-yearly carbon budgets commenced in 2021, with the five-yearly carbon budgets equating to a total reduction of 51% emissions over the period to 2030.

This reduction in emissions is in line with the programme for Government which commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade to achieve net zero emissions by 2050. This Act will drive implementation of a suite of policies to help us achieve this goal.

The Act also includes the following key elements:

- Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Embeds the process of carbon budgeting into law, Government is required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021;
- Actions for each sector will be detailed in the Climate Action Plan, updated annually;



- A National Long Term Climate Action Strategy will be prepared every five years.
- Requires all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.

#### 2.14.2.1 National Energy and Climate Plan 2021 – 2030

The National Energy and Climate Plan (NECP) 2021-2030 aims to diversify and decarbonise Ireland's electricity generation sector, with the long-term objective of decarbonising the energy sector and achieving an economic transformation with a carbon neutral agriculture and land use sector by 2050.

The NECP reiterates the plan to move away from peat-fired power generation and the implementation of the Just Transition Plan for the midland's region particularly in response to the closure of two ESB power stations and the decision to cease all peat extraction a number of years earlier than had been planned. Bord na Móna's Edenderry Power Station ceased burning peat at the end of 2023 but continues to operate, firing biomass to produce electricity.

The regularisation of the planning status of the Application Site will provide the potential to allow the Application Site to contribute to the decarbonisation of the electricity generation sector.

#### 2.14.2.2 Irelands Transition to a Low Carbon Energy Future 2015 – 2030 White Paper

The Government White Paper entitled Ireland's Transition to a Low Carbon Energy Future 2015-2030 sets out a framework to guide Ireland's energy policy development. This White Paper sets out to guide policy and actions that the Irish Government intends to take within the energy sector up to 2030 and also reaching as far as 2050. The framework was developed in the context of the significant role played by European institutions in determining energy policy, markets and regulation. Similarly, it takes account of European and international climate change objectives.

The overall vision within the White Paper means that by 2050, greenhouse gas emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, and will fall to zero or below by 2100. However, specifically in terms of non-renewable energies such as peat bogs, the White Paper notes that:

*"Fuels with higher carbon content (peat and coal) will become relatively more expensive and be replaced over time by fuels with lower carbon content, for example natural gas and renewables".*

It is significant as it was the first time a government has proposed the eventual elimination of fossil fuels from Ireland's energy system. The then Minister for Energy, Alex White, stated that:

*"high-carbon fuels like peat and coal will give way to lower-carbon or renewable alternatives in the short to medium term before fossil fuels are largely replaced by renewable energy sources by 2050. Greenhouse gas emissions from the energy sector will "fall to zero or below by 2100".*

The regularisation of the planning status of the Application Site will provide the potential to allow the Application Site to contribute to the decarbonisation of the energy sector.

#### 2.14.2.3 RePEAT Project

On 5th October 2021, the Minister for Agriculture, Food and the Marine along with Minister of State announced that their department is investing in two key projects that support the storing of carbon in our soils.



The projects will deliver increased and refined data and soil maps that inform the monitoring, reporting and verification of Greenhouse Gases (GHG) through two key actions:

- **Action no. 1:** identification of potential areas for reduced management intensity; and
- **Action no. 2:** the development of a National Soil Moisture Monitoring network.

The RePEAT project aims at addressing Action No. 1. The project is intended to be an interdisciplinary project that involves, “*A Modern Resurvey of Mapped Irish Peatlands to Refine Assessment of Land Use Change and Progress Greenhouse Gas Removal and Emissions Inventories*”.

This is because the soil maps that are currently available are not at a scale to accurately identify, at field level, the location of peat soils. Accurate peatland maps will be part of the requirements to incorporate reduced management of farmed peatlands into a larger agri-environment programme under Ireland’s CAP strategic Plan.

Research is therefore required to enable the precise identification of agricultural land use and intensity of land use on former peatlands, which will in turn facilitate better management of these systems and help to mitigate national emissions.

## 2.15 Regional Policy Context

### 2.15.1.1 Regional Spatial and Economic Strategy for the Southern Region 2020- 2032

The Regional Spatial and Economic Strategy (RSES) covers the years 2020-2032 and provides a high-level development framework for the Southern Region that supports the implementation of the NPF and the relevant economic policies and objectives of Government. The Application Site is located within the administrative boundaries of Tipperary County Council.

The RSES provides a 5-year strategy to deliver the transformational change that is necessary to achieve the objectives and vision of the Southern Region. The RSES includes guiding principles to be applied to development on peatlands, these are:

- Growing the dividend from the Region’s clean renewable energy and tourism potential is clearly identified in the NPF, as is the developments of a more integrated network of greenways, blueways and peatways to support diversification of rural and regional economies
- Facilitate appropriate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level
- Recognising the value of our peatlands as carbon sinks is key to carbon sequestration in the Region
- Development of interconnecting Blueways, Greenways and Peatways to revitalise local communities and support economic development

Other Policies in the RSES which are indirectly relevant to the Application Site include:



**RPO 1** – Any reference to support for all plans, projects, activities and development in the RSES should be considered to refer to ‘environmentally sustainable development’ that has no adverse effects on the integrity of European sites and no net loss of biodiversity, that shall be subject to appropriate feasibility studies, best practice site/route selection (to consider environmental constraints such as landscape, cultural heritage, the protection of water quality, flood risks and biodiversity as a minimum), environmental assessment including EclA to support development management and where required, the completion of statutory SEA, EIA and AA processes as appropriate.

**RPO 50** - It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, renewable energy.

**RPO 60** - It is an objective to: develop social enterprises and the circular economy within local communities to benefit environmental protection, employment generation and community development.

**RPO 87** – It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.

**RPO 95** - It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

**RPO 104** - Support investment in initiatives to develop innovation, advances in technology and pilot projects for the sustainable development of energy storage and carbon capture within the Region and to work with key stakeholders in developing sustainable forestry, including initiatives for native tree planting and better management of peatland and soil management to support carbon sequestration and enhancement of biodiversity

Having regard to the above regional policies and outcomes, the RSES identifies the need to “safeguard and enhance our environment through sustainable development, transitioning to a low carbon and climate resilient society”. In this regard, the RSES clearly acknowledges that the Region’s current reliance on traditional power sources (e.g. fossil fuels such as coal, peat and oil-fired generators) is not a sustainable long-term strategy, and in light of the climate change emergency occurring both within Ireland and at a broader global scale, the establishment of a low-carbon power system based on renewable energy is a necessary pre-requisite for future development.

**RPO 99** - *It is an objective to support the sustainable development of renewable wind energy (onshore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*

Building on the above aim, the RSES identifies several key drivers required to support and facilitate the electricity generation via indigenous renewable sources:

- **RPO 219** - It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers;
- **RPO 221a** - Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres
- Harness natural assets and develop potential for renewable energy generation in wind/wave/tidal/solar/hydro/bio-energy & promote energy efficiency,



- Incentivising and awarding innovation in design, energy efficiency, green infrastructure and smart technology integration.

The RSES supports an increase in the amount of new renewable energy sources in the Region in accordance with National policy and the RPOs outlined in this Strategy. The following RPOs ensure that regional energy resources are developed in a safe and secure way to meet projected demand levels, to meet Government Policy, to ensure a long-term, sustainable and competitive energy future for Ireland and enable energy service providers to deliver their statutory function:

- **RPO 96** - It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.
- **RPO 222** – It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid’s (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

The RSES references the increasing areas of cutaway peatlands within the region in the context of potential beneficial after-uses including renewable energy, biodiversity, amenity uses, carbon storage and other infrastructure. The majority of these proposed uses relate to both climate mitigation and adaptation measures and the need to ensure that land use changes do not impact on the ability of the natural environment to absorb climate impacts as per the following RSES Guiding Principles:

- Recognise peatlands as the most important long-term carbon store in the terrestrial biosphere;
- Support the development of Greenways, Blueways and Peatways including initiatives to extend existing greenways and blueways and link into regional and national networks, ports and other transport hubs;
- Development of interconnecting Blueways, Greenways and Peatways to revitalise local communities and support economic development; and,
- Careful protection of peatlands as a natural amenity.

This is in line with BnM’s own vision for the peatland extraction areas such as the Application Site. The regularisation of the planning status of the Application Site and the ongoing implementation of the Cutaway Bog Decommissioning and Rehabilitation Plan (see Appendix 4-2, Volume 3, of this rEIAR) will contribute to the abovementioned guiding principles.



## 2.15.2 Local Policy Context

The Application Site is located within the functional area of Tipperary County Council, and therefore, the planning framework applicable to the Application Site would have been set out in the relevant historic County Development Plans (CDPs) once they came into force. *Tipperary County Council* was established on the 1st of June 2014, issuing its first County Development Plan in 2022. Prior to this, Tipperary County was divided into North Tipperary County Council and South Tipperary County Council. These separate County Councils created individual County Development Plans until the amalgamated Tipperary County Council was established. The last South Tipperary County Development Plans was adopted in 2009, and the last North Tipperary County Development Plan was adopted in 2010. The relevant provisions of the current CDP, the Tipperary County Development Plan 2022 – 2028, is set out in detail below while previous CDPs are also set out in this section for context, where available

A review of the policy documents illustrates that for the lifetime of all CDPs, the industrial uses at the Application Site were largely consistent with local planning policy. The industrial heritage of Bord na Móna is recognised as part of the cultural heritage of the landscape and as an important contributor to the rural economy. Alongside this, policies to support the eventual transition of the peatlands have been included in more recent CDPs, acknowledging the ecological potential of the area as well as reflecting the emerging climate and energy goals.

### 2.15.2.1 *Tipperary County Development Plan 2022 - 2028*

The Tipperary County Development Plan 2022-2028 came into effect 22nd August 2022. The Plan outlines the overall strategy from proper planning and sustainable development as well as a land use plan for the County over a 6-year period. This Development Plan is informed by the National Planning Framework, the Southern Regional Spatial and Economic Strategy and Section 28 Guidelines and is accompanied by: Appropriate Assessment (AA) Screening Report and Natura Impact Report (NIR) Strategic Environmental Assessment (SEA) Strategic Flood Risk Assessment (SFRA). The Strategic Vision for the Plan is: “Tipperary - the place where every individual, business, and community can prosper, and every visitor is captivated.”

The CDP notes that Tipperary has extensive areas of industrial cut-over peatland, and it is noted that peat-fired electricity generation will be phased out in line with the Government’s Climate Action Plan (DECC, 2019). The Council recognises the potential of these industrial peatlands in relation to after uses and jobs opportunity, ranging from amenity, tourism, biodiversity services, ‘wild areas’, flood management, climate mitigation, energy development, industry, education, conservation and many more. The Council supports the preparation of a framework plan for the industrial peatlands, and will work with all stakeholders, including Bord na Mona, involved in the process in this regard.

The Council has the following Policies and Objectives with regards to these peatlands as follows:

- **3I** ‘Support projects which assist the transition of industrial cut-over peatlands to sustainable after uses.’
- **14C** ‘Support investment and collaboration, and feasibility study, design and planning processes, in the development of greenway and blueways, peatways and trail corridors between county and regional settlements, and the potential for sustainable linkages with other existing / proposed greenways, blueways, peatways and trails both within and without the county to create interregional routes.’
- **11-4** ‘(a) Conserve, protect and enhance areas of local biodiversity value, habitats, ecosystems and ecological corridors, in both urban and rural areas, including rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands in accordance with the objectives of the National Biodiversity Plan (DCHG 2017) and any review thereof.’



- **11-14** *'Support the diversification of peatlands, whilst ensuring the protection of their ecological, archaeological, cultural and educational significance in line with the National Peatlands Strategy (DAHG 2015). The Council may request landowners to prepare a 'Peatland Master Plan', especially for areas of industrial cut-over peatland, and will work with all stakeholders involved in the process in this regard. Any Masterplan should identify any significant tourism, amenity and recreation potential of these lands.'*

#### 2.15.2.2 North Tipperary County Development Plan 2010 – 2016

The North Tipperary County Development Plan 2010-2016, adopted in 2010, recognises the roles of peatlands as both a source of employment and natural amenity. As peat extraction was dwindling, the Development Plan recognises that peatlands still have the opportunity to diversify the local economy through the provision of large-scale energy production including wind farms. The Development Plan commits to supporting the sustainable use of peatlands as employment generators while complying with all relevant planning environmental regulations.

The Council does require that all wind farms proposed within its boundaries meet the statutory requirements and prescribed regulations. This includes completing an Environmental Impact Assessment and Appropriate Assessment as part of the planning application where the proposed development meets the threshold requirements. The planning application must also consider provisions for connecting the wind farm to the grid as well as avoiding injury to the amenity of the surrounding area through noise, traffic, shadow flicker and visual impact.

#### 2.15.2.3 South Tipperary Draft County Development Plan 2002

The South Tipperary Draft County Development Plan 2002 states that extractive industries should not affect the overall quality of the environment.

#### 2.15.2.4 North Tipperary County Development Plan 1998

The North Tipperary County Development Plan 1998 states that it is an objective of the Planning Authority to facilitate job creating including industrial and commercial development in appropriate areas. The CDP also states that it will support the endeavours of other employment related bodies to create jobs in the county. These development proposals will all be subject to the relevant planning regulations and requirements.

#### 2.15.2.5 South Tipperary Draft County Development Plan 1996

The South Tipperary Draft County Development Plan 1996 states that all industrial development to take place within the county should be designed to a high standard in order to reduce visual impact. They will also be subject to high safety standards on the site.

#### 2.15.2.6 North Tipperary County Development Plan 1977

The North Tipperary County Development Plan 1977 states that it is the policy of the Planning Authority to promote and accelerate economic growth within the county, including industry within rural areas.



### 2.15.3 Bord na Móna Policy Context

#### 2.15.3.1 *Brown to Green Strategy 2018*

Building on the objectives of the Strategic Framework, Bord na Móna announced its ‘Brown-to-Green’ Strategy in October 2018<sup>10</sup> which involves 3 no. key functions to support the company’s transition from peat extraction to developing climate solutions in renewable energy, carbon storage and biodiversity conservation:

- Consolidate and simplify Bord na Móna’s business structures in order to decarbonise and reposition the company as a renewable energy, resource recovery and low carbon sustainable business;
- Accelerate plans and the development of Bord na Móna’s renewable energy and resource recovery businesses; and,
- The development of new sustainable businesses to support significant employment.

The implementation of the ‘Brown-to-Green’ Strategy between 2018 – 2020 resulted in both significant changes and progress in re-focusing and strengthening Bord na Móna’s operations to renewable energy generation, recycling and the development of other low carbon enterprises. It also ultimately resulted in cessation of peat harvesting on all land owned by the Applicant.

Bord na Móna’s formal announcement in January 2021 that all industrial scale peat extraction on lands within its management would permanently cease represents a milestone in the implementation of the ‘Brown-to-Green’ strategy, as indicated within the announcement<sup>11</sup> details,

*“The Brown to Green strategy has involved the transformation of Bord na Móna from a traditional peat business into a climate solutions company... As we have put our new climate-focused business in place, we have also completely stopped a number of high carbon operations and transitioned others to a more sustainable model... Today marks the formal end to the company’s association with peat harvesting, as we move on to tackle the critical challenges concerning climate change, energy supply, biodiversity and the circular economy.”*

Bord na Móna continues to progress its ‘Brown-to-Green’ Strategy on the basis of 3 no. core strategic actions:

- Provide Ireland with sustainable energy from renewable sources at scale;
- Effectively rehabilitate our peatlands; and
- Help Ireland reimagine how it engages with climate action.

Any future development proposals on the Application Site will be implemented in tandem with the rehabilitation of cutover peatlands therein to ensure environmental stabilisation of the site and the optimisation of climate action benefits associated with the same. As required under their IPC Licence obligations (refer to Section 2.1.2 above), Bord na Móna must prepare and implement a rehabilitation plan for each of the bogs comprising the Boora Bog Group, following consultation with relevant stakeholders, as defined by Condition 10 of their licence (Ref. P0499-01):

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<sup>10</sup> Remarks by the Chief Executive of Bord na Móna to the Oireachtas Committee on Climate Action (13th November 2018)

<sup>11</sup> Source - <https://www.bordnamona.ie/bord-na-mona-delivering-on-climate-action/>



*10.1 Following termination of use or involvement of all or part of the site in the licensed activity, the licensee shall:*

*10.1.1 Decommission, render safe or remove for disposal/recovery, any soil, subsoils, buildings, plant or equipment, or any waste, materials, or substances or other matter contained therein or thereon, that may result in environmental pollution.*

*10.1.2 Implement the agreed cutaway bog rehabilitation plan.*

The discharge of Condition 10 will facilitate the permanent rehabilitation of the Application Site in conjunction with any parallel future end-uses (such as wind energy infrastructure). Chapter 4 - Description of the Development, Volume 2, of this rEIAR provides a more comprehensive review of the rehabilitation plan for the Application Site. The Cutaway Bog Decommissioning and Rehabilitation Plan for Littleton, Longfordpass, Lanespark and Derryvella Bogs can be found in Appendix 4-2, Volume 3.

#### *2.15.3.2 Bord na Móna's Sustainability 2030 Strategy and Biodiversity Action Plan 2016 -2021*

Bord na Móna launched its first Biodiversity Action Plan in 2010 with the aim to set out a strategic plan on how it intended to build on the wealth of peatland management, rehabilitation, restoration and conservation that it has built up since its establishment in the 1940s.

The Bord na Móna Biodiversity Action Plan 2016-2021 builds on the foundation of the original core objectives and the actions set out in the 2010-2015 plan, reframing them in the current context and perspectives of peatland biodiversity management, restoration and conservation and also in the outlook for Bord na Móna as set out in the company's Sustainability 2030 report launched in October 2015.

The key objectives of the Biodiversity Action Plan are to:

- Understand the current baseline ecological condition of Bord na Móna bog areas and the biodiversity present;
- Develop methods to rehabilitate and restore peatland areas in the post-production use phase;
- Engaging with the full range of stakeholders in relation to the management of biodiversity on Bord na Móna bogs and promoting awareness of the importance of biodiversity; and
- Provide a mechanism whereby the delivery and progress of the objective outlined within the Biodiversity Action Plan could be reviewed and assessed annually.

#### *2.15.3.3 Bord na Móna Landbank Future Uses*

Bord na Móna's operations and management of its lands have historically reflected the overarching needs and aims of the country whether being the development of a national indigenous fuel source, or now, the need to reach net zero emissions and establish a low carbon power system by 2050. In this regard, Bord na Móna has historically exhibited a forward-facing approach to how Ireland's peatlands should be utilised for the betterment of local communities and citizens. Bord na Móna's current vision of a climate neutral Ireland and its transformation into a 'climate solution' company is therefore not a matter of happenstance; but rather, a carefully considered and programmed transition based on evidence-led studies and data concerning global climate change and necessary actions required to manage same.



Bord na Móna has a vast land bank totalling approximately 80,000 hectares, or approximately 7% of the peatlands of Ireland. These lands, located mainly in the Midlands, represent not only one of the company's principal assets, but also an important resource for the nation as a whole. The publishing of Bord na Móna's 'Strategic Framework for the Future Use of Peatlands' ('Strategic Framework') in 2011 initially set out the company's long-term commitment to the sustainable economic development of the Midlands region, for the benefit, and support of, its rural communities, through a mix of appropriate new uses, including renewable energy and other developments. Specifically, one of the key themes underpinning the Strategic Framework is the need to unlock the potential of extant and future cutover bog for renewable energy development in addition to other alternative uses such as amenity and tourism, biodiversity and ecosystem services. The co-location of renewable energy infrastructure and other appropriate alternatives uses on cutover bog was considered a key driver in achieving a 'low carbon and climate resilient Ireland'<sup>12</sup> within this early strategy.

#### 2.15.3.4 *Planning Policy Conclusions*

As demonstrated by the strategic policies and objectives set out, national, regional and local planning policy, the investment in, and implementation of, climate action measures to achieve cross-sectoral decarbonisation and the establishment of low carbon economies through increased renewable energy generation is a key prerequisite in achieving Ireland's binding climate change targets and net zero carbon energy system by 2050. These policy documents also provide support for the activities which took place at the Application Site during its peat extraction period as it provided essential employment to rural areas whilst facilitating energy supply. The regularisation (without prejudice) of peat extraction and ancillary activities along with the rehabilitation measures (set out in Chapter - 4 Description of the Development, Volume 2, of the rEIAR) at the Application Site is considered consistent with the overarching planning framework set out in the abovementioned policy context. The rationale for this conclusion is based on the following, inter alia:

- The CAP 25 target of installing 9GW of onshore wind energy by 2030.
- The policies and objectives of Chapter 7 of CAP25 titled 'Delivering a Just Transition in the Midlands Region' and the continued rollout of the National Just Transition Fund.
- The policies and objectives of the Revised NPF, particularly National Strategic Outcome 8 Transition to a Carbon Neutral and Climate Resilient Society.
- The NDP's strategic investment priorities associated with the Just Transition is the conservation, restoration and management of Ireland's peatlands and other habitats in order to reduce carbon emissions. The NDP also commits to increasing the share of renewable electricity up to 80% by 2030.
- The Eastern and Midland RSES emphasises the need for the sustainable management of strategic natural assets such peatlands. This requirement for proactive and sustainable management of peatland, for both socio-economic and climate action benefit, is set out in the Regional Policy Objectives, particularly RPO 4.84 and 7.29.
- The current and most recent Offaly County Development Plan 2021 - 2027 acknowledges the changing nature of peatland sites due to the phasing out of peat-fired electricity generation. It also supports potential future uses, such as wind energy, and peatland rehabilitation.

## 2.16 Cumulative Impact Assessment

The EIA Directive states that an EIAR should contain cumulative effects, which are defined as:

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<sup>12</sup> Section 5.2.6 of 'Ireland 2040 Our Plan – Issues and Choices' (2016) – a paper issued in respect of public consultation for the National Framework Plan



*'A description of the likely significant effects of the project on the environment resulting from...the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.'*

The EIA Directive and associated guidance documents state that, as well as considering any indirect, secondary, transboundary, short-, medium-, and long-term, permanent and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this rEIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise or in the case of rEIA, may have arisen. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil and geology, hydrology, air, climate, noise and vibration, material assets, traffic and transport, landscape and cultural heritage as well as the interactions between these factors.

### 2.16.1 Methodology for the Cumulative Assessment of Projects

To gather a comprehensive view of cumulative effects on the above environmental considerations and to inform the rEIA process being undertaken by the consenting authority (An Coimisiún Pleanála), each relevant chapter within the rEIAR addresses the potential for cumulative effects to arise or may have arisen, where appropriate.

A cumulative assessment of peat extraction and ancillary activities at the Application Site was undertaken with the purpose of identifying what influence the peat extraction has had, or potentially could have, on the surrounding environment when considered cumulatively and in combination with relevant permitted, proposed and constructed projects and other land-uses in the vicinity of the Application Site. Cumulative impacts are defined as *'impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project'*<sup>13</sup>.

The Cumulative Impact Assessments (CIA) of projects has four principle aims:

- To establish the range and nature of existing projects within the cumulative impact study area of the Application Site.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- To establish anticipated cumulative impact findings from expert opinions within each relevant field. Detailed cumulative impact assessments are included in each relevant section of the rEIAR.
- To identify the projects that hold the potential for cumulative interaction within the context of the development and discard projects that will neither directly nor indirectly contribute to cumulative impacts.

Assessment material for this cumulative impact assessment was compiled on the relevant developments within the vicinity of the Application Site with reference to Guidance contained in Section 3.7 of the Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2022) and Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions (EC, 1999)

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<sup>13</sup> Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions, European Commission, 1999



The material was gathered through a search of relevant online Planning Registers (e.g. Tipperary County Council's and ACP's online planning portals), reviews of relevant EIAR documents, planning application details and planning drawings in order to identify past projects, their activities and their environmental effects.

The cumulative assessment study area was informed by study areas relevant to each environmental discipline.

#### 2.16.2 Projects Considered in the Cumulative Impact Assessment

The projects considered in relation to the potential for cumulative effects, and for which all relevant data was reviewed, include those given planning permission up to April 2026, those reasonably foreseen to take place in the future, and any relevant historical developments in operation within 5km of the Application Site. The projects were split as per phase, during Peat Extraction Phase between 1988 and 2017, the Current Phase from 2017 until present day and any future projects that may be constructed or continue to operate after present day during the Rehabilitation Phase. A full list of projects considered for cumulative assessment are included in Appendix 2-2, Volume 3. The main projects considered for each phase of development are identified in Tables 2-3 - Table 2-5 below.



**Table 2-3: Relevant projects considered for the Peat Extraction Phase (1988 - 2017)**

Planning Authority	App Ref.	Development/Project Description	Address	Grant Date	
<b>Littleton Briquette Factory</b>					
Tipperary Council	County	P39788	Relocate baling house in existing briquette factory	Killeen, Littleton	30/05/1985
		991431	Retention of extension for fire lighter manufacturer and storage and bund area	Lanespark, Littleton, Co Tipperary	18/02/2000
		P34576	Briquette factory	Killeen, Littleton, Co Tipperary	15/07/1977
		P34921	Briquette factory complex, workshops and office building	Killeen, Littleton, Co Tipperary	14/03/1978



Planning Authority	App Ref.	Development/Project Description	Address	Grant Date
<b>Other Cumulative Projects</b>				
ACP	NMS10.MS2008	The M8 motorway is a significant development in the local, and would have been constructed in parts through numerous planning applications to both the local authority and An Coimisiún Pleanála (formerly An Bord Pleanála). In this context, the part of the motorway which runs adjacent to the Application Site has been considered as part of this cumulative assessment	Multiple townlands – Cullahill to Urlingford	23/12/2004
<b>Other peat extraction activities proximate to the Application Site.</b>				
Tipperary County Council	N/A	Historical peat extraction proximate to the site including the Littleton Bog group which were subject to the conditions of Bord na Móna's IPC Licence (Ref. P0499-01) from the EPA		



**Table 2-4: Relevant projects considered for the Current Phase (2017 – Present Day)**

Those projects detailed in Table 2-3, the construction and/or operation of which may overlap with the Current Phase have been considered within the cumulative assessment for this phase.

Planning Authority	App Ref.	Development/Project Description	Address	Grant Date
<b>Site of the Former Littleton Briquette Factory</b>				
Tipperary County Council	24178	an existing ESB substation and distribution room building and all associated site works	Killeens, Ballynonty, Thurles, Co Tipperary	31/10/2024
	20976	(i) the erection of a roofed structure to the rear of the existing industrial shed, (ii) the erection of signage on existing screen wall to the front elevation	Littleton Briquette Factory, Killeens, Ballynonty, Thurles, Co. Tipperary	22/11/2020
<b>Other Cumulative Projects</b>				



Planning Authority	App Ref.	Development/Project Description	Address	Grant Date
Tipperary County Council, An Coimisiún Pleanála	TCC Ref. 2560154 ACP Ref. 323662-25	A recreational shared cycle and walkway to connect into the existing Loch Dhoire Bhile Loop - a) the delivery of a shared cycle and walkway on Bord na Móna lands. This will include the repurposing of 602 meters of existing former rail bed, 2859 meters along existing bog headlands / former high fields, and 721 meters along pre-existing machine access routes, b) the construction of car and / or bicycle parking facilities at a number of gateway locations along the proposed route and the provision of EV charging spaces at the gateway locations. This will include; i. 2 no. Type 2 Gateways, ii. 1 no. Type 4 Gateway, iii. 1 no. Minor Rest Points, c) Upgrade works to 1 no. local access road crossing and 4 no. agricultural access crossings, d) the erection of wayfinding and interpretative signage at Gateway locations along the route, e) the implementation of Sustainable Drainage Systems (SuDS) nature-based drainage proposals at the Gateway locations to cater for surface water drainage at car park locations, f) fencing and screening will be erected where required for health and safety and biodiversity reasons which will include 2250 meters of screening and 1925 meters of boundary treatment fencing, g) all other ancillary and associated site work. This Planning Application is accompanied by a Natura Impact Statement (NIS)		27/01/26

**Table-2-5: Relevant projects considered for the Rehabilitation Phase**



Those projects detailed in Tables 2-3 and 2-4, the construction and/or operation of which may overlap with the Rehabilitation Phase have been considered within the cumulative assessment for this phase.

Planning Authority	App Ref.	Development/Project Description	Address	Grant Date
N/A – Future Application	N/A	<p>Future Use of lands at the Application Site for a renewable energy development.</p> <p>The future use of the lands within the Application Site will be a separate and standalone Application, therefore, they are considered cumulatively for the purpose of this Application. It is intended to develop lands at the Application Site in the future for a renewable energy development and to carry out rehabilitation on the bogs where relevant. As outlined above, it is intended to use lands at the Application Site for a renewable energy development. Littleton Wind Farm DAC (a joint venture between SSE and Bord na Mona) intends to submit an Application for, inter alia, an 11 no. turbine wind farm. This will be a standalone SID Application, submitted directly to An Coimisiún Pleanála and will be accompanied by an EIAR which will include an assessment of the implementation of the rehabilitation measures at the Application Site in conjunction with the construction, operation, and decommissioning of the Proposed Wind Farm.</p>		N/A



## 2.17 Scoping and Consultation

### 2.17.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to a remedial Environmental Impact Assessment (rEIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the Project. These organisations are invited to submit comments on the scope of the rEIA and the specific standards of information they require.

Comprehensive and timely scoping helps ensure that the rEIA refers to all relevant aspects of the Project and its potential effects on the environment and provides initial feedback in the early stages of the project when alterations are still easily incorporated into the design. In this way, scoping both informs the content and scope of the rEIA and provides a feedback mechanism for the Project itself.

A scoping report, providing details of the Application Site and the Project, was prepared by FT and circulated in December 2022. FT requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the rEIA process. Following the recent updates made to legislation on governing Substitute Consent as noted in Section 2.2.1 and the passage of time, a request for comments on the scoping report was recirculated in January 2026 with follow up requests sent in September. The scoping responses from relevant personnel/bodies in their respective capacities as consultees are listed below and the relevant responses included as Appendix 2-1, Volume 3 of this rEIA.



**Table 2-6: A list of the consultees and responses received from the rEIAR Scoping Exercise.**

Consultee	Date Response Received	Response Received (if applicable)
Tipperary County Council - Environmental Department	20.01.26 and 22.01.26	Tipperary replied and confirmed that the council had no comments to make on the Application.
Tipperary County Council - Heritage Department	20.01.26 and 22.01.26	Tipperary replied and confirmed that the council had no comments to make on the Application.
Tipperary County Council - Planning Department	20.01.26 and 22.01.26	Tipperary replied and confirmed that the council had no comments to make on the Application.
Tipperary County Council - Roads Department	20.01.26 and 22.01.26	Tipperary replied and confirmed that the council had no comments to make on the Application.
Minister for Housing, Local Government & Heritage	20.01.26	Reference number for case provided as: Pre00016/2026
Minister for Agriculture, Food and the Marine	N/A	N/A
Minister for Climate, Energy and the Environment	13.02.26	This is a very significant site in terms of climate change record in the post glacial period, The importance of the record held within the pollen in the peat make this site nationally important. With the current plan, there are potential impacts on the integrity of the site. The development should assess this site as a constraint to development. Ideally, the site should not be damaged or integrity impacted or reduced in any manner due to the proposed development. However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts. Where the integrity cannot be preserved, we would ask that careful consideration be given in design to accommodating preservation of newly revealed soil and sediment exposures and access to the site during construction to record the exposures to strengthen our knowledge and datasets.



Consultee	Date Response Received	Response Received (if applicable)
Minister for Transport	04.02.26	No comment to make at this point in time. Keep the Department informed of any further updates in relation to the Project
Minister for Minister for Tourism, Enterprise and Employment	N/A	N/A
Southern Regional Assembly	N/A	N/A
Inland Fisheries Ireland (IFI)	N/A	N/A
Transport Infrastructure Ireland (TII)	04.02.26	<p>"Notes proximity to Motorway. With respect to rEIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of a rEIAR, which may impact the National Roads Network.</p> <p>The developer/scheme promoter should have regard, inter alia, to the following:</p> <ul style="list-style-type: none"> <li>•Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.</li> <li>•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.</li> <li>•The developer should assess visual impacts from existing national roads.</li> <li>•The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.</li> <li>•The developer, in preparing rEIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).</li> </ul>



Consultee	Date Response Received	Response Received (if applicable)
		<ul style="list-style-type: none"> <li>•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).</li> <li>•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)).</li> <li>•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. In relation to national roads, the Authority’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.</li> <li>•The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,</li> <li>•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, including any national road structures and motorway assets, underpasses, culverts, drainage regimes, etc.</li> </ul>



Consultee	Date Response Received	Response Received (if applicable)
		<p>•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.</p> <p>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 practise."</p> <p>Please refer to Appendix 2-1, Volume 3, for the full scoping response received.</p>
Environmental Protection Agency (EPA)	N/A	N/A
The Heritage Council	N/A	N/A
An Taisce	N/A	N/A
An Chomhairle Ealaíon (Arts Council)	N/A	N/A
Failte Ireland	03.02.26	<p>Passed on the Failte Ireland EIAR Guidelines to inform the preparation of the rEIAR.</p> <p>Please refer to Appendix 2-1, Volume 3, for the full scoping response received.</p>
Irish Aviation Authority	N/A	N/A
Office of Public Works	N/A	N/A
Health and Safety Authority	N/A	N/A



Consultee	Date Response Received	Response Received (if applicable)
Uisce Eireann	10.02.26	<p>Sent a detailed response outlining standard water related planning requirements to be considered as part of the rEIAR (please refer to Appendix 2-1, Volume 3 of this Application).</p> <p>Please refer to Appendix 2-1, Volume 3, for the full scoping response received.</p>
Health Service Executive (HSE)	N/A	N/A
Geological Survey Ireland (GSI)	13.02.26	Responded under the submission from the Minister for Climate, Energy and the Environment.
Irish Peatland Conservation Council	03.02.26	<p>The Irish Peatland Conservation Council urges that this substitute consent application be evaluated not merely as a retrospective administrative exercise, but as a critical assessment of the profound environmental debt incurred through decades of industrial extraction. The historical peat extraction at has contributed to a fragmented landscape where the loss of ecosystem services ranging from carbon sequestration, biodiversity and water quality is now being felt in the context of a national Climate and Biodiversity Emergency.</p> <p>Please refer to Appendix 2-1, Volume 3, for the full scoping response received.</p>
Irish Wildlife Trust	27.01.26	Do not have staff capacity to respond to this consultation at the moment but will endeavour to respond if possible.
Butterfly Conservation Ireland	N/A	N/A
Birdwatch Ireland	N/A	N/A
National Parks and Wildlife Service (NPWS)	N/A	N/A
Teagasc	N/A	N/A



Consultee	Date Response Received	Response Received (if applicable)
Sustainable Energy Authority Ireland	N/A	N/A
National Transport Authority	N/A	N/A
Forestry Services	N/A	N/A
National Monuments Service	N/A	N/A
Bat Conservation Ireland	22.01.26	Unable to comment on Application for scoping due to limited resourcing.
Waterways Ireland	N/A	N/A
Irish Raptor Study Group	N/A	N/A
Coillte	N/A	N/A
Bird Watch Ireland	N/A	N/A



### 2.17.2 Pre-Planning Consultation

A pre-planning meeting was held with An Coimisiún Pleanála on the 13th of February 2026. Members of the design team. The team gave an overview of the Project in a Power Point Presentation. Matters discussed included:

- Site Location
- Historical Background of Bord na Móna
- Works for which Substitute Consent is being Sought
- Updates to Legislation
- Exceptional Circumstances
- Application Contents
- Administrative Matters
- Drawing Scales
- Number of hard/soft copies required for lodgement

Further detailed information is contained in Appendix 2-1, Volume 3, of this rEIAR.



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