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

Remedial Environmental Impact Assessment Report

Chapter 11 – Landscape and Visual

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BnM

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11. LANDSCAPE AND VISUAL IMPACTS

11.1 Introduction

This chapter examines any significant effects of peat extraction and ancillary activities at the Application Site during the Peat Extraction Phase, the Current Phase, and the Remedial Phase on landscape and visual amenity. These phases, outlined in Chapter 4 - Description of the Development, Volume 2 provide the framework for examining both landscape and visual effects that have occurred or are anticipated. Where significant effects are identified, the chapter identifies appropriate mitigation strategies to avoid, reduce, or offset significant adverse environmental effects along with any relevant monitoring arrangements. The focus here is on existing or previously implemented measures that address the likely impacts of peat extraction and ancillary activities. A comprehensive description of the development itself is provided in Chapter 4 - Description of the Development, Volume 2.

- Peat Extraction Phase (July 1988 – 2017): This period encompasses all peat extraction operations and related works at the Application Site until extraction ceased in 2017. Further detail is provided in Sections 4.4 to 4.7 of Chapter 4 - Description of the Development, Volume 2.
- Current Phase (2017 – present): This phase addresses the ongoing management of the Application Site since the cessation of peat extraction. It is described in Sections 4.7 and 4.8, Chapter 4 - Description of the Development, Volume 2.
- Remedial Phase (future): This phase considers planned activities intended to restore or remediate the Application Site. Details are set out in Section 4.9, Chapter 4 - Description of the Development, Volume 2.

Although interconnected, landscape and visual impacts are assessed separately.

Landscape Assessment examines physical changes to the environment resulting from development, which may alter the character of the area. This involves a detailed analysis of the landscape's individual elements and characteristics to understand what contributes to its overall identity. Such analysis enables judgements about landscape quality (or integrity), highlights key sensitivities, and evaluates the extent to which the landscape can accommodate change without unacceptable adverse effects.

Visual Impact Assessment considers how alterations to the landscape affect the composition of views, their perception, and overall visual amenity. Unlike landscape impacts, which are resource-based, visual impacts are assessed in terms of their effects on populations.

11.1.1 Statement of Authority

This chapter has been prepared by Evan Rossiter, with the assistance of Ida Wulff, and reviewed and approved by Jim Hughes, all of Fehily Timoney and Company.

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.

Ida Wulff is a Graduate Planner with Fehily Timoney and Company and holds a Masters' degree in Planning and Sustainable Development, and a Bachelor's degree in International Development from University College Cork. Ida has one years' experience preparing EIAR chapter for a range of development types.

This chapter has been reviewed and approved by Jim Hughes. Jim 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.

11.1.2 Description of Development

Industrial scale peat extraction was permanently ceased within the Application Site in 2017. The development for which substitute consent is intended to be sought consists of the following:

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

Certain ancillary infrastructure were either constructed before the commencement of the formal planning system, or benefits from planning permission, and as such does not require Substitute Consent. This infrastructure includes the following:

- Welfare Facilities
- Work Sites
- Workshops

All infrastructure ancillary to peat extraction will be assessed as part of the rEIAR and rNIS assessments, regardless of whether substitute consent is being sought in respect of it.

11.2 Methodology

The preparation of this Landscape and Visual Impact Assessment (LVIA) comprised the following key components:

- **Desktop Analysis:** A systematic review of relevant landscape and visual characterisation studies, together with applicable designations contained within successive iterations of the Tipperary County Development Plan.

- **Site Investigations:** On-site surveys conducted over a number years in connection with various projects located within, and in proximity to, the Littleton Bog Group.
- **Retrospective Landscape Impact Evaluation:** An appraisal of the significance of landscape effects arising from peat extraction and ancillary activities. This evaluation was undertaken by considering the sensitivity of the landscape resource in relation to the magnitude of the impacts identified.
- **Retrospective Visual Impact Evaluation:** An appraisal of the significance of visual effects attributable to peat extraction and ancillary activities. This assessment was carried out by weighing the sensitivity of visual receptors against the magnitude of the visual changes observed.

11.2.1 Guidance and Legislative Review

This chapter has been prepared with reference to the following guidelines and relevant policy documents:

- Institute of Environmental Management and Assessment (IEMA) and Landscape Institute (UK) 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3-2013)
- EPA Guidelines on the information to be contained in Environmental Impact
- Assessment Reports (EIA Reports) (2022) and draft revised Guidelines on information to be contained in Environmental Impact Statements
- Advice Notes for preparing EIS (2015)
- Directive 2011/92/EU as amended by Directive 2014/52/EU
- The Planning and Development, Maritime and Valuation (Amendment) Act 2022 (Commencement of Certain Provisions) (No.2) Order 2023 (S.I. 645 of 2023)
- The 2022 Act amending the Planning and Development Act 2000, Part XA, (and related articles in the Planning and Development Regulations 2001 (as amended))
- Planning and Development Act 2024
- North Tipperary County Development Plan 2010 (As Varied)
- Tipperary County Development Plan 2022 - 2028

11.2.2 Desk Review

A comprehensive desk-based study was carried out to compile and review background information relevant to the development as part of the assessment process. The sources consulted and data obtained are catalogued in Table 11-1.

Table 11-1: Data Sources

Source	Data	Date
Tipperary County Council	North Tipperary County Development Plan 2010 (As Varied)	2010 - 2022
Tipperary County Council	Tipperary County Development Plan 2022 - 2028	2022 - 2028
Bord na Móna	Aerial Photography - Appendix 4-4, Volume 3	1973, 1995, 2001, 2005, 2018
Bord na Móna	Peat Extraction Area Maps (Figures 4.3 to 4.7 of Volume 4 of this rEIAR)	1973, 1988, 1995, 2004, 2017

11.2.3 Impact Assessment Methodology

11.2.3.1 Landscape Impact Assessment Criteria

In accordance with the principles set out in GLVIA3, the assessment of potential landscape impacts arising from a proposed development is undertaken with reference to the following key criteria:

- Landscape character, value, and sensitivity
- Magnitude of anticipated impacts
- Significance of resultant landscape effects

Landscape sensitivity is defined as the extent to which a given setting is capable of accommodating change or the introduction of new elements without incurring unacceptable adverse effects on its fundamental characteristics. The classification of Landscape Value and Sensitivity is based on the criteria presented in Table 11-2, which has been derived from a combination of non-prescriptive guidance provided in GLVIA3 and established industry best practice.

Table 11-2: Landscape Value and Sensitivity

Sensitivity	Description
Very High	Areas where the landscape character exhibits a very low capacity for change in the form of development. Examples of which are high value landscapes, protected at an international or national level (e.g. World Heritage Site), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the landscape character exhibits a low capacity for change in the form of development. Examples of which are high value landscapes, protected at a national or regional level, where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the landscape character exhibits some capacity and scope for development. Examples of which are landscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the landscape character exhibits a higher capacity for change from development. Typically, this would include lower value, non-designated landscapes that may also have some elements or features of recognisable quality, where management objectives include, enhancement, repair and restoration.
Negligible	Areas of landscape character that include derelict sites and degradation where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of landscape improvements and/or restoration.

The magnitude of a landscape impact is determined by the scale, extent, and degree of change anticipated as a consequence of the proposed development. In evaluating magnitude, consideration is given both to direct physical effects arising from the removal or alteration of landscape components, and to indirect changes that extend beyond the immediate setting, thereby influencing the broader landscape character. Reference is made to Table 11-3 for the detailed criteria applied in this assessment.

Table 11-3: Magnitude of Landscape Impacts

Sensitivity	Description
Very High	Change that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the landscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the landscape in terms of character, value and quality.
Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to changes in landscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements.
Negligible	Changes affecting small or very restricted areas of landscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing landscape or are hardly perceivable.
Positive	Changes that restore a degraded landscape or reinforce characteristic landscape elements.

The significance of a landscape impact is determined through the relationship between the sensitivity of the landscape receptor and the magnitude of the identified impact. The evaluation of significance is undertaken by applying the matrix presented in Table 11-4.

Table 11-4: Impact Significance Matrix

	Sensitivity of Receptor				
Scale/Magnitude	*Very High*	*High*	*Medium*	*Low*	*Negligible*
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial-moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial-moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

Note: The significance matrix serves as an indicative framework for deriving the level of impact significance. Final determinations are made by the assessor through the application of professional judgement. Owing to nuances within the underlying sensitivity and magnitude evaluations, the outcome may vary by up to one category above or below the matrix indication. Impacts highlighted in orange are classified as significant impacts for the purposes of Environmental Impact Assessment (EIA). In this context, effects assessed as Substantial or higher are deemed Significant, whereas those assessed as Substantial–Moderate or lower are considered Non-significant.

11.2.3.2 Visual Impact Assessment Criteria

In line with GLVIA3, the assessment of visual impacts is undertaken as a function of receptor sensitivity weighed against the magnitude of the visual effect.

Sensitivity of Visual Receptors

Unlike landscape sensitivity, which is resource-based, visual receptor sensitivity is anthropocentric in nature. It reflects human perception and considers factors such as:

- The perceived quality and value attributed to the view
- The landscape context in which the viewer is situated
- The activity being undertaken by the viewer and the extent to which this activity heightens awareness of the surrounding landscape

These factors are applied by the assessor to establish the sensitivity of visual receptors at each representative viewpoint.

Susceptibility of Receptors

In accordance with the IEMA Guidelines for Landscape and Visual Assessment (3rd edition, 2013), receptors most susceptible to changes in views and visual amenity include:

- Residents at home;

- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area;
- Travelers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened.

Visual receptors that are less susceptible to changes in views and visual amenity include;

- People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape;
- People at their place of work whose attention may be focused on their work or activity, not their surroundings and where the setting is not important to the quality of working life.

Values Typically Associated with Views

The sensitivity of a view is influenced by a range of factors that contribute to its perceived value. These include:

- **Recognised scenic value:** Views formally designated in County Development Plans or widely acknowledged through guidebooks, touring maps, postcards, and similar sources. Such designations reflect a public consensus, often established through consultation processes, regarding the importance of particular scenic routes and vistas.
- **Views within highly sensitive landscape areas:** Locations such as Architectural Conservation Areas, identified within Development Plans and subject to public consultation, where receptors are likely to be particularly attuned to the surrounding landscape.
- **Primary residential views:** Outlooks from residential properties, which are a key consideration in relation to residential amenity.
- **Intensity of use and popularity:** The frequency and scale at which a view is experienced, particularly where it holds significance at regional or national levels.
- **Viewer connection with the landscape:** The degree of attentiveness to the landscape, which varies depending on activity (e.g., commuters passing quickly versus tourists focusing on landscape character and detail).
- **Provision of panoramic vistas:** Elevated or expansive viewpoints that afford broad, sweeping views, often heightening receptor awareness of the surrounding landscape.
- **Sense of remoteness or tranquillity:** Views characterised by quiet, static, or isolated settings, which tend to heighten sensitivity compared to dynamic urban scenes.
- **Perceived naturalness:** The extent to which a view is valued for its natural qualities, with high sensitivity to intrusion from distinctly artificial or man-made features.
- **Presence of striking or noteworthy features:** Views containing distinctive or memorable landscape elements that enhance their value.
- **Historical, cultural, or spiritual significance:** Locations where receptors may experience heightened awareness due to attributes that evoke contemplation, reflection, or cultural resonance.

- **Rarity or uniqueness:** Views that represent uncommon or distinctive landscape types, particularly where similar vistas are not readily available elsewhere in the region or country.
- **Integrity of landscape character:** The condition and coherence of the landscape pattern, whether composed of a few strongly related components or a more varied and disparate arrangement.
- **Sense of place:** The presence of a distinctive identity or harmony at the viewing location.
- **Sense of awe:** Views that inspire an overwhelming perception of scale, grandeur, or the power of natural forces.

Locations that satisfy multiple criteria are generally considered to exhibit higher sensitivity. No hierarchy is implied by the order of listing. Overall sensitivity may derive from the cumulative influence of several factors or from a strong association with one or two particularly significant attributes.

11.3 Receiving Environment (Baseline Year 1988)

The following landscape description pertains to the baseline year of 1988. This baseline scenario provides the reference condition against which subsequent changes to the existing landscape context are assessed, both in terms of direct physical impacts on landform and land cover, and in relation to broader effects on landscape character.

The visual baseline identifies those locations where individuals engaged in specific activities, or residents situated in particular settings, were likely to have experienced views of peat extraction and ancillary activities. These views may have resulted in impacts on visual amenity.

A detailed description of the landscape context of the Application Site and the wider study area is presented below. This encompasses landform and drainage, vegetation and land use, centres of population and residential properties, transport corridors, and public amenities and facilities. Many of the landscape elements identified also function as visual receptors, namely places and transport routes from which the project could potentially be observed.

11.3.1 Study Area

The Application Site is located in County Tipperary, and within the administrative boundary of Tipperary County Council. The closest settlements to the Application Site are Urlingford (c. 5km to the north-east), Gortnahoe (c. 2.2km to the east), Twomileborris (c. 2km to the west), Littleton (c. 3km to the west) and New Birmingham (c. 2km to the east).

The Application Site comprises the Littleton, Longfordpass, Lanespark, and Derryvella bogs. This Application Site is located within the townlands of Kilmakill, Longfordpass North, Longfordpass East, Longfordpass South, Leigh, Bawnreagh, Clonoura, Noard, Newhill, Derryhogan, Ballybeg, Derryvella, Lanespark, and Killeen.

11.3.2 Landform and Drainage

Historically, the topographic profile of the Application Site was higher than that observed at present, with changes in elevation varying across the Application Site depending on each bog unit's initial drainage conditions and vegetation removal (see Section 4.5, Chapter 4 - Description of the Development, Volume 2).

As described in Chapter 4 - Description of the Development, Volume 2, the topography of the Application Site in 1988 is based on an assumed average milled peat extraction depth of <0.1 m per year over the 30-year period from 1988 to the cessation of peat extraction in 2017. Considering this, the resulting baseline elevations range from 123 to 133 m AOD.

All areas of the Application Site will have experienced some decrease in topography since 1988 due to the installation of drainage and removal of peat during peat extraction.

11.3.3 Vegetation and Land Use

Land-use changes within the Application Site have been investigated using available aerial photographs, topographic information present on historical mapping, and from descriptions provided in Section 4.3, Chapter 4 - Description of the Development, Volume 2. Observed changes in land-use from various data sources are summarised in Table 11-5. Data sources used to compile this summary include Bord na Móna Annual Reports, publicly available aerial photography, 1973 aerial photography (Appendix 4.4, Volume 3), and historic 6-inch and 25-inch Ordnance mapping.

The Tailte Eireann Land Cover database for Ireland (based on interpretation of satellite imagery and national vector mapping data) identifies the following land cover types within and surrounding the Application Site: peat bogs, moors and heath, coniferous forestry, mixed forestry, land principally occupied by agriculture, non-irrigate land, pastures and transitional woodland scrub. Land use at the Application Site is dominated by peat bog with smaller pockets of forestry and land used for agricultural purposes. Littleton is generally surrounded by farmland but there are extensive conifer plantations outside the eastern and western boundaries.

Bord na Móna landholdings at Littleton Bog includes approximately 800 acres of coniferous forestry that is managed exclusively by Coillte. However, the majority of the Land use at the Application Site has been well established as industrial peat extraction and ancillary activities, which were undertaken at the Application Site until cessation of peat extraction in 2017, current decommissioning and rehabilitation stage between 2017 and present day.

Table 11-5: Changes in Land-Use

Land Use Pre-1988 [Note 1]	
Area	**Comments**
Longfordpass Bog	Drainage works first commenced in Longfordpass Bog by 1947. The earliest available aerial imagery dating from 1973 shows sod peat drainage inserted at Longfordpass Bog. By 1988, there was 1. no pumps, and 3 no. silt ponds installed on Longfordpass Bog. Sod peat extraction began in 1952 and ceased in 1984. Sod peat was extracted for domestic sale and to supply fuel to the Southern Health Board for use in hospitals and other public health facilities. Following the cessation of sod peat extraction in 1984, the areas of sod peat extraction were converted to milled peat extraction. The drainage infrastructure was also amended to facilitate milled peat extraction. Ancillary activities and features were largely in place prior to 1988 including railway lines, machine passes, canteen structures, work sites, local holding areas, mobile fuel tanks, fixed fuel tanks, peat loading facilities, and end user sites.
Littleton Bog	Drainage works first commenced in Littleton Bog by 1941 according to Bord na Móna Annual Reports. The earliest available aerial imagery dating from 1973 shows sod peat drainage inserted at Littleton Bog. Sod peat extraction began in 1952 and ceased in 1984. Sod peat was extracted for domestic sale and to supply fuel to the Southern Health Board for use in hospitals and other public health facilities.

	Following the cessation of sod peat extraction in 1984, the areas of sod peat extraction were converted to milled peat extraction. The drainage infrastructure was also amended to facilitate milled peat extraction. Ancillary activities and features were largely in place prior to 1988 including railway lines, machine passes, canteen structures, work sites, local holding areas, mobile fuel tanks, fixed fuel tanks, peat loading facilities, and end user sites.
Lanespark Bog	Drainage works first commenced in Lanespark Bog by 1968. The earliest available aerial imagery dating from 1973 shows drainage inserted at Lanespark Bog. No records are available for the commencement of peat extraction at Lanespark Bog; however, aerial imagery of the Application Site shows peat extraction had commenced by 1973. Ancillary activities and features were largely in place prior to 1988 including railway lines, machine passes, canteen structures, work sites, local holding areas, mobile fuel tanks, fixed fuel tanks, peat loading facilities, and end user sites.
Derryvella Bog	Drainage works first commenced in Derryvella Bog by 1968. No records are available for the commencement of peat extraction at Lanespark Bog; however, aerial imagery of the Application Site shows peat extraction had commenced in Derryvella Bog by 1973.
Land Use Post-1988 [Note 2]	
Area	**Comments**
Longfordpass Bog	1988: Approximately 226ha of Longfordpass Bog was subject to peat extraction. The main landcover type at this time was cutover peat. Drainage was already installed, predominantly in a north-south orientation. Railway infrastructure was laid in the bog. In 1988, there as 1no. pumps, and 3 no. silt ponds installed on Longfordpass Bog. 1995: Almost the entire site displays bare peat, with bays typically running north–south and separated by drainage channels. Limited forestry and other vegetation occurs along the Application Site's peripheries. A rail line travels along the southern and eastern extent of the Application Site 2001: Little change had occurred since 1995, with only minor revegetation evident along some bays. 2006: Little change has occurred since 2001. Some additional areas of revegetation along the bays observed. 2013: Little change has occurred since 2006. 2017: Peat extraction ceased. 2018: Little change has occurred since 2013. 2024: Significant revegetation has occurred along the western half of the Application Site and along the southern extents
Littleton Bog	1988: Approximately 795ha of Littleton Bog was subject to peat extraction. The main landcover type at this time was cutover peat. In 1988, there were 12no. pumps installed on Littleton Bog. 1995: Almost the entire site displays bare peat, with bays typically running NNE (southern half of site) to NNW (northern half of site) and separated by drainage channels. Forestry and other vegetation occurs along the Application Site's peripheries and along many of the peat bays. A large, forested area (approx. 80 ha) is located to the south of the Application Site. A rail line travels the entire length of the Application Site connecting Littleton Bog with Longfordpass Bog to the north and Lanespark Bog to the south. 2001: Little change since 1995. Numerous small, flooded areas within the Application Site. 2006: Little change since 2001. 2013: The central and southern portions of the Application Site display significant revegetation. 2017: Peat extraction ceased. 2018: Little change since 2013. 2024: Little change since 2018.
Lanespark Bog	1988: Approximately 239ha of Lanespark Bog were subject to peat extraction. The main landcover type at this time was cutover peat. Drainage was already installed, predominantly in a north-south orientation. Railway infrastructure was laid in the bog. In 1988, there were no pumps, and 4 no. silt ponds installed on Lanespark Bog. 1995: Almost the entire site displays bare peat, with bays typically running NW and separated by drainage channels. Vegetation limited to the Application Site 's peripheries. A compound containing numerous buildings is located within the southwestern extent of the Application Site. A rail line, which starts at the compound travels along the western periphery of the Application Site connecting Lanespark Bog with Littleton Bog. 2001: Little change had occurred since 1995. Some minor revegetation along the peat bays. 2006: Little change had occurred since 2001. Some minor revegetation along the peat bays. 2013: Little change had occurred since 2006. Some minor revegetation along the peat bays.

	2017: Peat extraction ceased. 2018: Little change had occurred since 2013. Some minor revegetation along the peat bays. 2024: Significant revegetation along the peat bays. Significant areas of localised flooding observed, most prevalent within the southern and central portions of the Application Site.
Derryvella Bog	1988: Approximately 92ha of Derryvella Bog were subject to peat extraction. Thus, the main landcover type at this time was cutover peat. Drainage was already installed, predominantly in a north-south orientation as describe above. Railway infrastructure was laid in the bog. In 1988, there were no pumps, and 1 no. silt ponds installed on Derryvella Bog. 1995: The western half of the Application Site is heavily vegetated with bays running NW and separated by drainage. Some localised flooding is present in this area. A pond is located within the northwestern extent of the Application Site. The eastern half of the Application Site displays bare peat with bays running NNE and separated by drainage. Limited forestry and other vegetation occur along the peripheries of the eastern half of the Application Site. 2001: A pond is now located within the northwestern extent of the Application Site. Flooding has reduced. 2006: Little change had occurred since 2001. Some additional drainage has been installed within the southern extern of the Application Site. 2013: Noticeable revegetation within the western half of the Application Site and within the Application Site 's southern extent. 2017: Peat extraction ceased. 2018: Little change had occurred since 2013. 2024: Some revegetation and significant flooding within the eastern half of the Application Site.
Note 1 - information sources include Bord na Móna Annual Reports, 1973 aerial photography (Appendix 4.4, Volume 3, and historic 6-inch and 25-inch Ordnance mapping. *Note 2 - information sources include GeoHive aerial imagery (1995, 2001, 2006, 2013), and Google Earth aerial imagery (2018, 2024)*	

11.3.4 Centres of Population and Houses

The Application Site is located in County Tipperary, and the closest settlements are Urlingford (ca. 5 km to the north-east), Gortnahoe (ca. 2.5 km to the east), Twomileborris (ca. 2 km to the west), Littleton (ca. 3km to the west) and New Birmingham (ca. 2 km to the east). The town of Thurles is located approximately 9km to the west of the Application Site.

There was in 1988, as at present day, a frequent, but dispersed rural population contained within the agricultural fringes of the bogs.

11.3.5 Transport Routes

There is an extensive network of roads in the area. Local primary roads L-4153, L-4114, and L-6204 travel through the study area. Regional road R-639, listed in the Tipperary CDP 2022 - 2028 as a Strategic Road, further travels along the length of the study area, connecting the settlements Littleton and Urlingford. The M8 also traverses along the study area, in a southwestern to northeastern direction. The main site access points are at the north and south ends of the bog adjacent to the railway line.

Several local roads are also situated in the immediate vicinity of the Application Site.

11.3.6 Recreation, Tourism and Heritage Amenities

There is no specific baseline information available for the levels of tourism experienced in the area surrounding the Application Site in 1988. Furthermore, the active peat extraction areas of the Application Site would not have been accessible or permitted for tourists or walkers to pass through during the Peat Extraction Phase.

Since its establishment, Bord na Móna has played a central role in building communities through a number of initiatives. Examining the case studies 'Rochfortbridge and Coill Dubh' presented in 'The Socio-Economic Impact of Bord na Móna on the East Midlands' (1987) report provides baseline evidence to suggest that social and economic impact arising from housing schemes combined to make rural regions more attractive places to live. According to the report 'Existing clubs such as the football, tennis and youth clubs were strengthened… A community hall was built… to which Bord na Móna contributed a substantial amount… When the housing scheme was built, Bord na Móna provided 8 acres for children and gave land to a pitch and putting club enabling it to be extended to an 18-hole course'.

11.4 Landscape and Visual Policy Context

11.4.1 Tipperary County Council and North Tipperary County Council Development Plans historic iterations

For the purpose of this assessment, the North Tipperary County Development Plan 2010 - 2016 (subsequently extended until 2022) and the current Tipperary County Council Development Plan 2022-2028 were considered.

11.4.1.1 Landscape Designations

North Tipperary County Development Plan 2010

In the North Tipperary County Development Plan 2010, the Core Aim listed in relation to Landscape, Water Quality & Heritage was:

> *To safeguard the natural and built heritage of the county, to maintain a high-quality environment while promoting sustainable appropriate developments to showcase the county's unique assets.*

In the Tipperary Landscape Character Assessment 2016, initially published in 2010, the Study Area is listed as being within the Landscape Character Type **A: The Plains**. It is further within **Landscape Character Area 8: Littleton Raised Bog**, and **Landscape Character Area 9: Littleton Farmland Mosaic and Marginal Peatlands**.

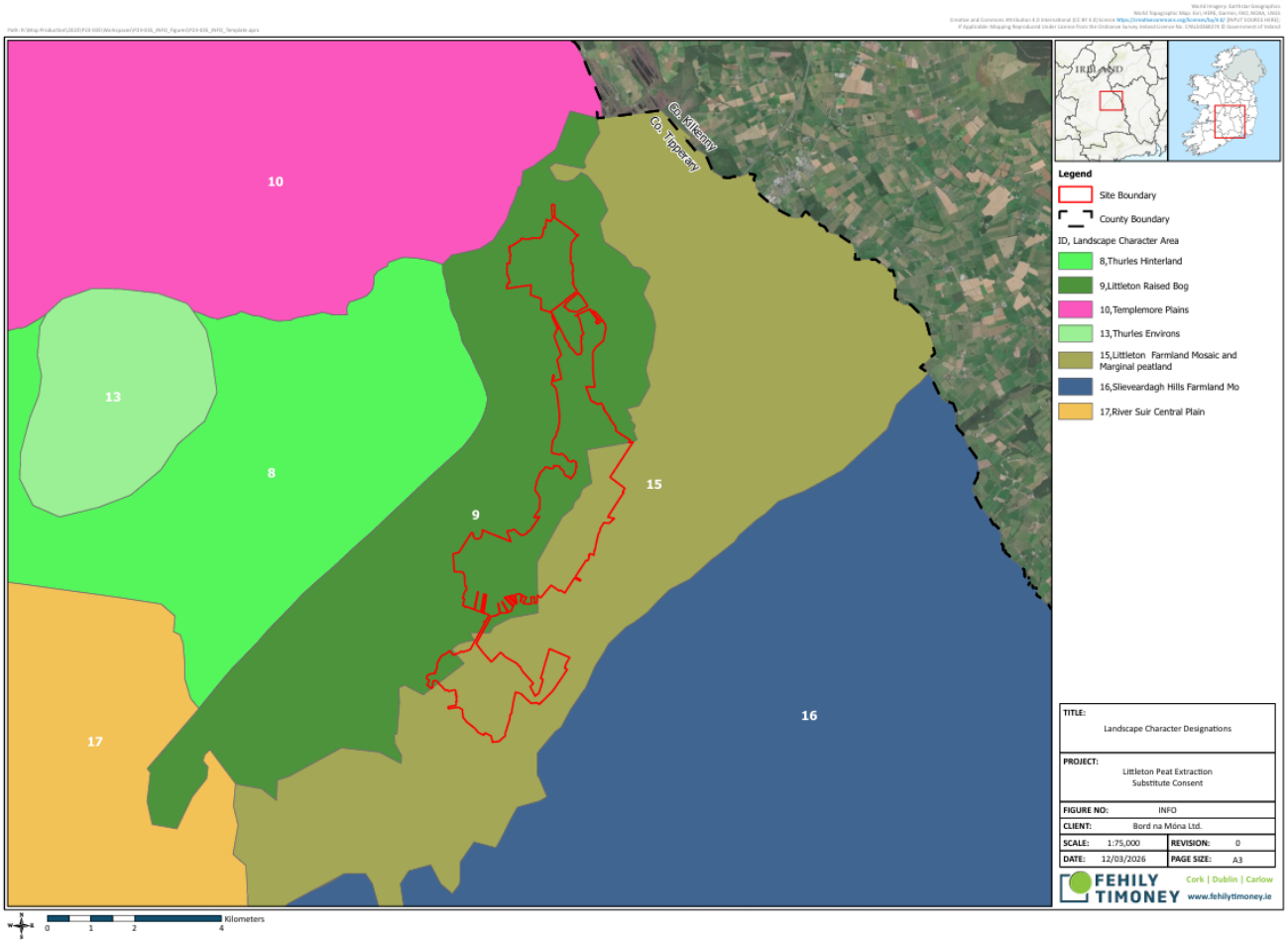

Plate 11-1: The Study Area in relation to the Tipperary Landscape Character Assessment 2016

The Tipperary Landscape Character Assessment 2016 describes the LCA 8: Littleton Raised Bog as:

> *A distinctive raised bog area, this extends eastwards from the N8 where it meets the county boundary with Kilkenny. The raised bog is set within an overall landscape not dissimilar to the undulating lowland of the Thurles hinterland.*

The LCA 8: Littleton Raised Bog has a landscape sensitivity rating ranging from Normal to Sensitive, with the overall rating being Sensitive. The landscape objective for LCA 8: Littleton Raised Bog is to Enhance, and the guideline listed in the Tipperary Landscape Character Assessment 2016 is to:

> *Facilitate development with capacity to continue and enhance established patterns of use and settlement without significant change to appearance or character.*

The Tipperary Landscape Character Assessment 2016 describes the LCA 9: Littleton Farmland Mosaic and Marginal Peatlands as:

> *This area is considered distinctive in its character as a lowland character area of the county due to its subtle differences and its sense of removal from the richer and more densely populated River Suir Central Plain. Agriculture in the area is pastoral based and productively varies greatly throughout this LCA. In the vicinity of Grange and Kilcooley the land is rich and productive, yet as one travels towards the peatlands to the North West the quality of the land is poorer.*

The LCA 9: Littleton Farmland Mosaic and Marginal Peatlands has a high capacity/low Landscape Sensitivity, Class 1, i.e. Change or Development generally acceptable as it may beneficially alter, enhance or reinforce landscape character and value. The LCA's conservation values are generally limited to a local level of importance. There are no environmental designations and limited aesthetic or recreational amenity value associated with this area. The principals for management for LCA 9: Littleton Farmland Mosaic and Marginal Peatlands as listed in the Tipperary Landscape Character Assessment 2016 is:

> *A continued facilitation of the existing agricultural uses in the area along with consolidation and enhancement of settlement in the villages in order to retain their self-sufficiency should be the ultimate objective in the management of this area. The greatest potential for change to the character of this LCA could occur through change to the Slieveardagh Escarpment, especially change that that would dramatically alter the skyline.*

In the North Tipperary County Development Plan 2010 the Study Area was not listed as a Primary or Secondary Amenity Area.

Tipperary County Council Development Plan 2022-2028

Tipperary County Council Development Plan 2022-2028 uses the same Tipperary Landscape Character Assessment 2016 as was used in the North Tipperary County Development Plan 2010. Accordingly, the Study Area sits within Landscape Character Area (LCA) LCA 8: Littleton Raised Bog and LCA 9: Littleton Farmland Mosaic and Marginal Peatlands, carrying over the designation from the previous Development Plan.

The LCA 8: Littleton Raised Bog is defined in the Tipperary County Council Development Plan 2022-2028 as a distinctive raised bog area, which extends eastwards from the N8 where it meets the county boundary with Kilkenny. The raised bog is set within an overall landscape not dissimilar to the undulating lowland of the Thurles hinterland. In the context of the County Landscape Capacity, this is a **Class 3 Landscape** i.e. high sensitivity to change, and limited capacity to accommodate change with detriment. These landscapes require significant additional care during design and assessment of alternatives to determine how established patterns of use and settlement can be accommodated. Principles for landscape management include:

- Sensitive siting and design of individual buildings and groups of buildings as well as site treatment appropriate to the area will be of importance in this landscape. Specific design guidance should be provided to facilitate these outcomes.
- Design guidance in respect of commercial forestry in upland areas should be provided in order to integrate this land use into the landscape.
- Clear felling practices regarding commercial forestry should be revised to mitigate against negative visual impact.
- The untouched raised bog habitat is a valuable asset. All land use management Principals need to consider the protection and enhancement of same.

- A village design statement for Littleton and its environs would assist in retaining and enhancing the settlement character of the area.
- Farming practices should be such as to minimise hedgerow removal.

The LCA 9: Littleton Farmland Mosaic and Marginal Peatlands is defined in the Tipperary County Council Development Plan 2022-2028 as an area is considered distinctive in its character as a lowland character area of the county due to its subtle differences and its sense of removal from the richer and more densely populated River Suir Central Plain. Agriculture in the area is pastoral based and productively varies greatly throughout this LCA. In the vicinity of Grange and Kilcooley the land is rich and productive, yet as one travels towards the peatlands to the North West the quality of the land is poorer. In the context of the County Landscape Capacity, this is a **Class 1 Landscape** i.e. change or Development generally acceptable as it may beneficially alter, enhance or reinforce landscape character and value (e.g. the landscape is robust in its character, undergoing change or the precedent for such and similar development is set and the landscape is capable of absorbing considerable change without detriment).

Within the Tipperary County Council Development Plan 2022 - 2028 Settlement Strategy, the Study Area is located in part on an area designated as Under Urban Influence, and in part on an area designated as Open Countryside.

The Study Area is not designated as an Amenity Area.

There are policies in the Tipperary County Council 2022-2028 relating to landscape and peatlands:

> ***11-15:*** *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.*
>
> ***11-16:*** *Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.*
>
> ***11-17:*** *Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. New development shall have regard to the following:*
> *a) Developments should avoid visually prominent locations and be designed to use existing topography to minimise adverse visual impact on the character of primary and secondary amenity areas.*
> *b) Buildings and structures shall integrate with the landscape through careful use of scale, form and finishes.*
> *c) Existing landscape features, including trees, hedgerows and distinctive boundary treatment shall be protected and integrated into the design proposal.*

11.4.1.2 Scenic Designations

The M8 which runs parallel to the study area on the northern boundary is designated within the Tipperary County Council Development Plan 2022-2028 as a Scenic Route, with the description: *"Views from M8 near Longford's Pass"*.

Another Scenic Route is designed along the R689 ca. 2.5km to the East of the Study area. This is described as *"Views to the west between Glenoogle and Ballysloe, along road R689".*

The nearest scenic viewpoint to the Study Area is the Views from the N75 in Borris, east of Thurles. This is located ca. 3.5-4km to the west of the northern part of the Study Area. There are no other Scenic Views designated in the vicinity of the Study Area.

11.5 Assessment of Significant Landscape and Visual Effects

This assessment addresses the landscape and visual impacts arising from peat extraction and ancillary activities undertaken since 1988, including those that may remain evident today. For clarity, the assessment is structured into two distinct periods: the Peat Extraction Phase and the Current Phase, as detailed in Section 11.1.

11.5.1 Do-Nothing Scenario

As outlined in the EPA Guidelines (May 2022), the description of 'Do-Nothing Effects' relates to the environment as it would be in the future should the proposed project not be carried out. As discussed in Section 3.3, the assessment period of this rEIAR commenced in 1988, a time at which peat extraction was already well-established at the site. In the context of this rEIAR, the Project has been ongoing since the baseline assessment year of 1988. As outlined in Section 3.3, peat extraction activities commenced at the Application Site in 1941 with the installation of drainage.

The 'Do-Nothing' option is defined as the Project (as described in Section 4.3 of Chapter 4 - Description of the Development, Volume 2) having ceased at the Application Site in 1988.

In the event of the cessation of the Project at the Application Site in 1988, it is assumed that those lands which by that point had not been subject to the installation of drainage and peat extraction would have remained as a relatively intact raised bog with varying raised bog habitats (such as bog woodland, fen, sphagnum mosses).

Subsequently, other land-use practices may also have taken place on the Application Site such as agricultural or commercial forestry, or other commercial or non-commercial uses. Under this 'Do-Nothing' option, IPC Licence Ref. P0499-01 would not have been granted by the EPA in 2001, and associated decommissioning and planned rehabilitation would not have occurred.

For those lands which as of 1988 had been subject to the installation of drainage in preparation for peat extraction but not peat extraction itself, it is assumed in the 'do-nothing' scenario that drainage would have remained insitu. Maintenance works to keep established drainage channels clear would have ceased as of 1988 in the 'do-nothing' scenario. It is likely that these areas would have been subject to natural recolonisation of the bog surface. Minor third party turbary activities likely would have occurred along the intact bog edges as was common practice at sites such as the Application Site.

Peat extraction was underway at the Application Site prior to the required date for the transposition of the EIA Directive in 1988. If peat extraction and related activities ceased from 1988 onwards, then the various residual effects, described throughout this rEIAR, would not have occurred.

However, consideration must be given to the following:

The legislative mandate given to Bord na Móna in the form of the Turf Development Act 1946, as amended to acquire and develop peatlands; and,

The uncertainty with respect to the planning status of the activity did not arise until 2019 and was not evident in 1988.

Therefore, this 'Do-Nothing' option was not the chosen option. Peat extraction and ancillary activities have occurred at the Application Site from July 1988 onwards. A decision to cease peat extraction at the Application Site was taken in 2017 and the Application Site needs to be considered in the context of regularising (without prejudice) the planning status of the lands to facilitate future development (subject to planning consent as required). The Application Site has and will continue to revegetate, and there will be a change from areas of cutover peatland to revegetated peatland. These are described in the individual chapters of the rEIAR.

In the event that Substitute Consent is not granted, in effect, the "Do Nothing" option represents the current situation as at the date of the application for Substitute Consent. As part of Bord na Móna's statutory obligations under IPC Licence requirements, Cutaway Bog Decommissioning and Rehabilitation Plans will continue to be implemented for the Application Site separate to, and independent of, the Substitute Consent application. The implementation of the plans is included in the impact assessment below.

The role of cutaway/cutover peatlands such as the Application Site as a significant potential resource for amenity, tourism, biodiversity enhancement and conservation, improvement in air quality, climate mitigation, renewable energy development and education are part of Bord na Móna's vision for the Application Site. The regularisation of the planning status of the Application Site is a significant facilitator in ensuring the sustainable use and management of these peatlands. If this does not occur, the opportunity to continue employment and alternative use of the Application Site for the potential resources and activities mentioned above will be significantly restricted.

11.5.2 Landscape and Visual Sensitivity (Baseline Year 1988)

For the baseline year of 1988, the key factor in assessing the sensitivity of both the receiving landscape and surrounding visual receptors is that industrial-scale peat extraction had already been underway for several decades. By this time, significant alterations to the Application Site's terrain profile had occurred, and the landscape character was already heavily shaped by previous extraction and associated activities.

Similarly, the visual environment experienced by local residents and road users reflected these long-standing modifications. As a result, the sensitivity of the landscape to further changes of this established nature is considered **Low**, as is the sensitivity of the visual receptors.

11.5.3 Peat Extraction Phase (1988 – 2017) Landscape and Visual Effects

11.5.3.1 Peat Extraction Activities

By the baseline year of 1988, peat extraction within the Application Site had already been ongoing for approximately four decades. Milled peat was the sole form of peat extraction at the Application Site in 1988 and continued until the cessation of industrial peat extraction in 2017. This milled peat was transported to Littleton Briquette Factory located adjacent to the Application Site via the bog railway.

As part of the development of the Application Site for peat extraction, parallel surface water drains were created by machine excavators at specific intervals, depending on whether milled or sod peat was being extracted. The strips of bog between these drains were retained to form peat extraction 'fields'. By 1988 drainage channels, silt ponds, outfalls and pumps were extant at the Application Site. The Planning Drawing Pack which shows the detailed drainage across the Application Site.

Longfordpass Bog

Drainage works first commenced in Longfordpass Bog by 1947. The earliest available aerial imagery dating from 1973 shows sod peat drainage inserted at Longfordpass Bog. By 1988, Longfordpass bog was subject to milled peat extraction, and there was 1no. pumps, and 3 no. silt ponds installed on Longfordpass Bog.

Littleton Bog

Drainage works first commenced in Littleton Bog by 1941 according to Bord na Móna Annual Reports. The earliest available aerial imagery dating from 1973 shows sod peat drainage inserted at Littleton Bog. By 1988, By 1988, Littleton Bog was subject to milled peat extraction, and there were 12no. pumps installed on Littleton Bog.

Lanespark Bog

Drainage works first commenced in Lanespark Bog by 1968. The earliest available aerial imagery dating from 1973 shows drainage inserted at the periphery of Lanespark Bog. By 1988 the bog was fully drained for industrial scale milled peat extraction, and there were no pumps, and 4 no. silt ponds installed on Lanespark Bog.

Derryvella Bog

Drainage works first commenced in Derryvella Bog by 1968. The earliest available aerial imagery dating from 1973 shows drainage inserted at the periphery of Derryvella Bog. By 1988 the bog was fully drained for industrial scale milled peat extraction, and, there were no pumps, and 1 no. silt ponds installed on Derryvella Bog.

A comprehensive account of these activities is provided in Chapter 4 – Description of the Development, Volume 2.

11.5.3.1.1 Landscape Effects

Peat extraction and ancillary activities resulted in broad and substantial physical impacts on the bog landscape. Together with the associated transport infrastructure, these activities contributed to the industrialisation of what had previously been a naturalistic environment. However, the majority of this transformation had already taken place before 1988.

Accordingly, the landscape impacts during the extraction phase from 1988 until cessation in 2017 are assessed as being of **Medium magnitude** under the criteria outlined in Table 11-3. When considered alongside the **Low** landscape sensitivity rating from Section 11.5.2, the overall significance of effect is determined to be **Moderate-slight**. In Environmental Impact Assessment (EIA) terms, this does not constitute a significant effect.

11.5.3.1.2 Visual Effects

By 1988, a substantial portion of the bog had already been cutaway, drained, and prepared for extraction, with peat extraction ongoing across the Application Site since 1952. The associated visual impacts primarily related to the presence and movement of workers, machinery, transport infrastructure, and accommodation or welfare facilities. Dust plumes were also likely to have been visible in active extraction areas.

From most receptor locations within approximately 1-2 km of the site - including roads, settlements, and residences - the full extent of the Application Site was unlikely to have been visible. This was due to limited open views across the bogs and the screening effect of intervening vegetation. As a result, visual effects were generally confined to the immediate fringes of the bog.

Given this established baseline and the long-standing presence of industrial-scale peat extraction, predominantly during the summer months, it is unlikely that significant visual impacts arose between 1988 and the cessation of activities in 2017.

This distinction highlights the difference between landscape and visual impacts. Landscape impacts were large-scale, direct, and physical, resulting in a marked alteration of the landscape fabric and character. By contrast, visual impacts were less apparent, limited to discrete receptor locations, and therefore not directly comparable in significance. For these reasons, the magnitude of visual effects is assessed as **Low**. When combined with the **Low** visual receptor sensitivity rating from Section 11.5.2, the overall significance of effect is determined to be **Slight**, which does not constitute a significant effect in EIA terms.

11.5.4 Current Phase (2017 – Present Day)

11.5.4.1 Decommissioning

Decommissioning at the Application Site began in 2017 following the cessation of peat extraction, in line with the Cutaway Bog Decommissioning and Rehabilitation Plans prepared under IPC Licence requirements. These plans are detailed in Appendix4-2, Volume 3 of this rEIAR.

The primary objective was to identify and remove, dispose of, or recover infrastructure and materials that could pose ongoing environmental risks. In practice, this amounted to a site clean-up, including the removal of unused buildings and features, cleaning of silt ponds, and clearance of peat stockpiles.

These measures result in **Low** magnitude impacts on both the physical landscape and land cover, while facilitating regeneration through subsequent remedial works. Similarly, visual impacts are of **Low** magnitude, as most features being removed are located away from the public realm.

Decommissioning activities resemble construction processes, though in reverse and of shorter duration. While ongoing, they are assessed as generating a low, marginally negative impact on landscape and visual amenity. When combined with the **Low** landscape sensitivity rating from Section 11.5.2, the overall significance of decommissioning effects is judged to be **slight/neutral-negative**, and therefore not significant in EIA terms.

Once complete, however, the works will deliver a **positive** landscape and visual outcome, reducing evidence of human intervention compared with the baseline operational period (1988–2017).

11.5.4.2 Phase 1 Rehabilitation

Under Condition 10.2 of the IPC Licence, Bord na Móna is required to prepare and implement a Cutaway Bog Rehabilitation Plan. Decommissioning and Rehabilitation Plans have been prepared for each of the four bogs within the Application Site. Phase 1 Rehabilitation commenced accordingly in 2018 across the entire Application Site.

The measures most relevant to landscape and visual considerations include rewetting of bogs through drain blocking, berm construction, and field reprofiling. Additional interventions involve the establishment of grassland and birch-dominated scrub. These are relatively subtle physical changes when viewed against the baseline condition of cutaway peatlands, yet they deliver positive outcomes for biodiversity and contribute to a more naturalistic wetland character across the site.

Overall, these interventions are assessed as having **low-magnitude**, positive effects, resulting in a **slight/positive significance** in landscape and visual terms.

11.5.5 Remedial Phase

For Phase 2 Rehabilitation works, Bord na Móna are proposing to carry out additional rehabilitation in Derryvella Bog in 2026. No additional Rehabilitation works are proposed at Littleton, Longfordpass and Lanespark outside of the ongoing measures presented in Chapter 4 - Description of the Development, Volume 2 of this rEIAR (and as detailed in the Cutaway Bog Decommissioning and Rehabilitation Plans presented in Appendix 4-2, Volume 3).

11.5.6 Risk of Major Accidents and Natural Disasters

No major accidents or natural disasters occurred at or around the Application Site during the assessment period (1988–2017). As a result, there was no potential for significant landscape or visual impacts.

For the Current and Remedial Phases, the risk of major accidents or natural disasters with the potential to affect the landscape environment is assessed as **Low**.

11.5.7 Cumulative and Indirect Impacts

The full list of cumulative projects is detailed in Chapter 2 - Background, Volume 2 and Appendix 2-2, Volume 3 of the rEIAR. This has been reviewed in relation to potential landscape and visual cumulative impacts arising from peat extraction during the retrospective assessment period. None of the identified developments are considered likely to have given rise to significant cumulative effects. This conclusion reflects their distance from the Study Area, their scale, and the nature of the developments themselves, many of which would not typically be assessed cumulatively with peat extraction as they are of differing development types.

As a result, cumulative and indirect impacts are assessed as being of **Low** magnitude. When considered alongside the **Low** landscape and visual sensitivity ratings set out in Section 11.4, the overall significance of cumulative effects is assessed as **Slight**, and therefore not significant in EIA terms.

11.5.8 Ongoing and Future Enhanced Rehabilitation Measures (PCAS)

In accordance with Condition 10 of the IPC Licence, decommissioning and rehabilitation will be implemented as standard remedial measures linked to peat extraction activities and associated works at the Application Site. Complementing these requirements, Bord na Móna, supported by government funding and guided by its accelerated decarbonisation strategy, has committed to enhanced peatland decommissioning, rehabilitation, and restoration across approximately 33,000 hectares in more than 80 bogs.

This strategy is designed to maximise the ecosystem service benefits of peatland restoration, particularly through improved carbon storage and reduced emissions. Additional benefits include enhanced biodiversity, improved water quality and catchment management, and the creation of outdoor spaces for local communities.

From a landscape and visual perspective, the Peatlands Climate Action Scheme (PCAS) represents an expansion and intensification of the rewetting and rewilding measures outlined in Section 11.5.5. Accordingly, the associated effects are assessed as **positive**, with **a moderate-slight significance**.

11.5.9 Potential Future Use – Proposed Littleton Wind Farm

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 Moná) 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.

. Should planning permission be granted and construction proceed, the rehabilitation plan for the bogs within the site will require modification.

The wind farm project includes proposals to rehabilitate the area to support wetland habitats. Nevertheless, the development would marginally reduce the land available for rehabilitation. As a result, the cumulative impact is assessed as **slight-imperceptible** and **marginally negative in value.**

11.6 Mitigation and Monitoring Measures

To date, rehabilitation works within the Application Site have been limited and focused primarily on biodiversity enhancements rather than on reducing landscape or visual impacts. No specific landscape or visual mitigation measures are proposed, and consequently, there is no requirement for ongoing monitoring from a landscape or visual perspective.

11.7 Residual Effects

As no specific mitigation measures are required for landscape or visual effects, the residual impacts remain consistent with those outlined in Section 11.5.

11.8 References

North Tipperary County Development Plan 2010 (https://www.tipperarycoco.ie/sites/default/files/2022-08/NT%20Written%20Statement%20Dec%202017.pdf)

Tipperary County Council Development Plan 2022-2028 (https://www.tipperarycoco.ie/planning-and-building/development-plan-consultation/tipperary-county-development-plan-2022-2028)

Bord na Móna Aerial Photography (1973 - 2020)

Bord na Móna Peat Extraction Area Maps (1988 - 2017)

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