



APPENDIX 2-1

SCOPING RESPONSES

Edel Mulholland

From: Connor Rooney (Housing) <Connor.Rooney@housing.gov.ie>
Sent: Friday 25 February 2022 14:58
To: Karen Mulryan
Subject: RE: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

You don't often get email from connor.rooney@housing.gov.ie. [Learn why this is important](#)

Our Ref: G Pre00041/2022 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email manager.dau@housing.gov.ie.

Kind regards,

Connor Rooney
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90

From: Karen Mulryan <kmulryan@mkofireland.ie>
Sent: Monday 21 February 2022 12:51
To: Manager.DAU@chg.gov.ie; Housing Manager DAU <Manager.DAU@housing.gov.ie>
Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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Good afternoon,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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Ireland, H91 VW84
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Edel Mulholland

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Wednesday 11 February 2026 09:57
To: Edel Mulholland
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Department of Housing, Planning and Local Government

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Good Morning,

The Department is not in a position to make specific comment on this particular referral at this time. No inference should be drawn from this that the Department is satisfied or otherwise with the proposed activity.

The Department may submit observations/recommendations at a later stage in the process.

Regards

Diarmuid

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Tuesday 10 February 2026 15:25
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Department of Housing, Planning and Local Government

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Dear Sir or Madam,

Just following up on the below with regards to the Ballydermot Substitute Consent rEIAR scoping document. Please let me know if you need any additional information from my side.

Thank you, and I look forward to your response.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611



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From: Edel Mulholland

Sent: Thursday 15 January 2026 11:01

To: 'manager.dau@housing.gov.ie' <manager.dau@housing.gov.ie>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>

Subject: 250709 - Ballydermot Substitute Consent rEIAR - Department of Housing, Planning and Local Government

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

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Edel Mulholland

From: GCU - Reform Communications and Emergency Planning Divisional Mailbox
<GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: Tuesday 1 March 2022 15:54
To: Karen Mulryan
Subject: RE: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

Good afternoon Karen,

Thank you for your correspondence in relation to this project.

The Department of Transport has no observations to make at this point in time.

It would be appreciated if the Department could be informed of any future developments regarding this matter.

Kind regards
Jacqui

Jacqui Traynor
Reform Communications Emergency Planning

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177
Jacquitraylor@transport.gov.ie www.gov.ie/transport

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 21 February 2022 12:05
To: TRAYNOR Jacqui <JacquiTRAYNOR@transport.gov.ie>
Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

Good morning,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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Edel Mulholland

From: Ministers Office <Minister-Transport@corr.cloud.gov.ie>
Sent: Monday 19 January 2026 12:34
To: Edel Mulholland
Subject: Ref: TTAS-MO-00301-2026

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Our Ref: TTAS-MO-00301-2026

Dear Ms. Mulholland,

On behalf of the Minister for Transport, Darragh O'Brien, TD, I wish to thank you for your email regarding Ballydermot Substitute Consent rEIAR. As this is a matter under the remit of the Department of Climate, Environment and Energy, I have shared your email with the Minister's private office in that Department for attention and direct reply to you.

With best wishes,

Gordon Ryan

Private Secretary to Minister O'Brien TD

The Minister is a Designated Public Official under the Regulation of Lobbying Act, 2015 (details available on www.lobbying.ie)

An Roinn Iompair

Department of Transport

Lárna Liosain, Baile Átha Cliath, D02 TR60

Leeson Lane, Dublin, D02 TR60

www.gov.ie/transport

From: EIAPanning <eiapanning@epa.ie>
Sent: Wednesday 16 March 2022 15:07
To: Karen Mulryan
Subject: EIA Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Ballydermot Bog Group, on the border of County Offaly and County Kildare
Attachments: Ballydermot Subcon Scoping -F- 191136g 2022.02.11_compressed.pdf; Reply from DECC re EIS 22/59 EPA Ballydermot Bog Group, Co.Offaly and Co.Kildare; Substitute consent Bord na Mona Ballydermot bog group ref 2509; RE: [CASE: KCC-108834] - EPA request CRM:00246000000039

Re: EIA Scoping Opinion under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended
EPA Ref: 2509

Dear Ms Mulryan,

I refer to the request for a Scoping Opinion in relation to substitute consent for peat extraction activities at the Ballydermot Bog Group, located on the border of County Offaly and County Kildare, which was received by the Agency on 21 February 2022. In accordance with the requirements of Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU *on the assessment of the effects of certain public and private projects on the environment* (EIA Directive), and Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended, the Agency has consulted with the Planning Authorities: Offaly County Council and Kildare County Council and the relevant prescribed bodies under Section 89 of the EPA Act. Attached are copies of the responses received from the Department of Environment, Climate and Communications, Inland Fisheries Ireland and Kildare County Council.

Bord na Mona Allen Peat Limited was issued an Integrated Pollution Control (IPC) Licence (Register No. P0503) on 28 April 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 *'the extraction of peat in the course of business which involves an area exceeding 50 hectares'* at Allen Group, c/o Derrygreenagh Works, Rochfordbridge, Westmeath.

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

- (i) address the matters raised in the responses received from the bodies detailed above;
- (ii) have regard to the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0503 for any relevant bog areas;
- (iii) consideration should be given to inclusion of any relevant bog areas in an enhanced rehabilitation scheme, e.g., under the Peatlands Climate Action Scheme (PCAS).
- (iv) have regard to relevant water quality monitoring data. Any gaps in water quality data for receiving waters should be filled by a sampling programme over an appropriately representative period of time.

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

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

Yours faithfully,
Environmental Licensing Programme

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



053-916 0600 (Switch)

eiaplanning@epa.ie

www.epa.ie



From: Karen Mulryan <kmulryan@mkoireland.ie>

Sent: Monday 21 February 2022 12:24

To: EIAPanning <eiaplanning@epa.ie>

Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

Good morning,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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Edel Mulholland

From: planning applications <planning.applications@failteireland.ie>
Sent: Monday 7 March 2022 11:20
To: Karen Mulryan
Subject: RE: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare
Attachments: Fáilte Ireland EIAR Guidelines.pdf

Hello Karen,

Thank you for your email regarding the scoping for the Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86
Currently working Remotely |  +353 (0)86 0357590



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From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 21 February 2022 12:30
To: planning applications <planning.applications@failteireland.ie>
Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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Good afternoon,

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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Fáilte Ireland
National Tourism Development Authority

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



An tÚdarás Náisiúnta Forbartha Turasóireachta
Áras Fáilte, 88–95 Sráid Amiens
Baile Átha Cliath 1
D01 WR86
Éire

National Tourism Development Authority
Áras Fáilte, 88 - 95 Amiens Street
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Contents

1. Introduction	1
2. Background to this Document.....	1
3. Legislation and Statutory Guidance	2
4. Assessing Tourism	4
5. Guiding Principles of EIAR	5
6. Consideration of Competency and Qualifications	5
7. EIAR Requirements.....	5
Population and Human Health	7
Biodiversity	7
Land, Soils and Geology	7
Water	8
Air Quality and Climate	8
Noise and Vibration.....	8
Material Assets; Traffic and Transport.....	8
Cultural Heritage	8
Archaeology	8
Material Assets; Waste Management.....	8
Material Assets	8
Landscape	8
8. Sources of information on Tourism	9
Information available online.....	9

1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Cunnane Stratton Reynolds on behalf of Fáilte Ireland to update their EIA guidelines in line with changes in legislative requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€8.4 billion**, and exchequer revenue of **€1.78 billion** in 2018, which helps fund other key public services.

In 2018 Ireland welcomed **10.6 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Draft guidelines on the information to be contained in Environmental Impact Assessment Reports in August 2017. At the time of this document the guidelines have not been adopted from draft.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

The process of EIA is set out in the EPA EIAR Guidelines, which this document should be read in conjunction with and used as supplementary guidance to. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

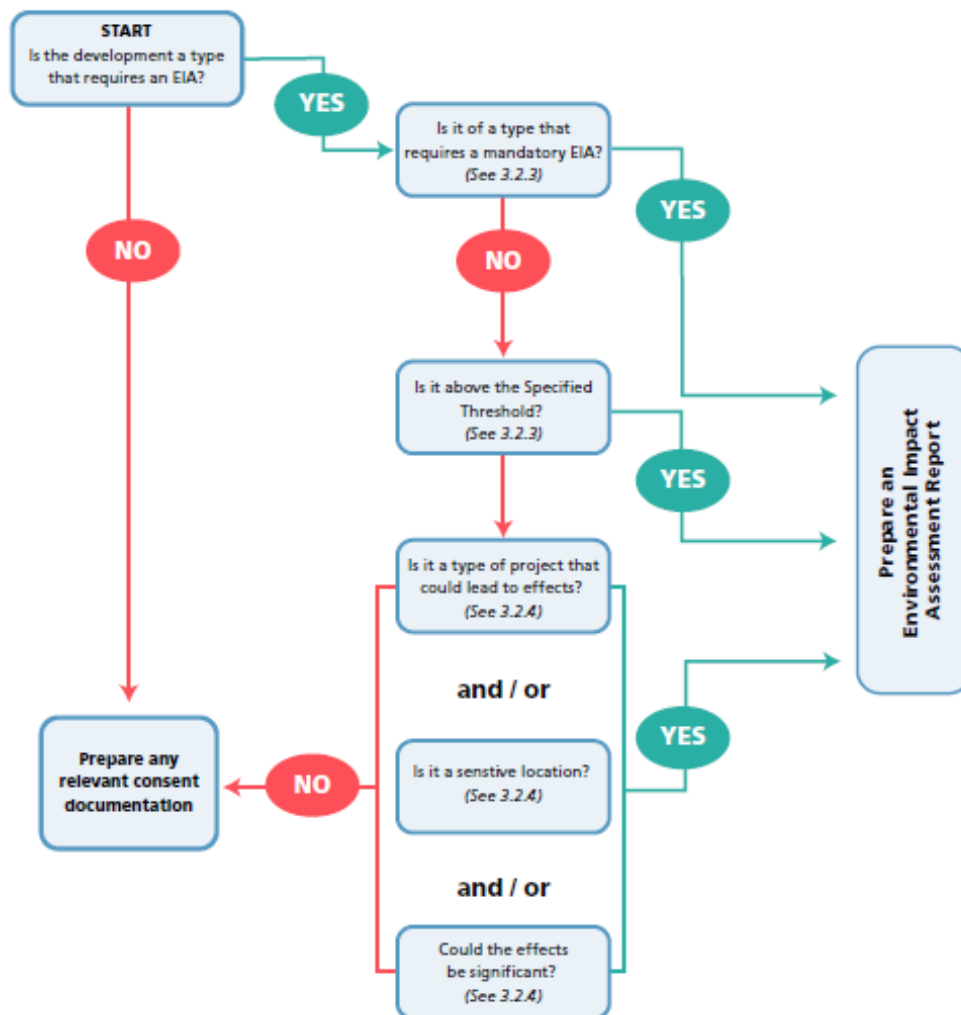
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but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

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Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there will still be a requirement for an EIAR for that development.

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Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

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Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious - forest trails, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element have potential particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2018 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
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- Nature, Wildlife and Natural Attractions
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These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA Draft EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by 'competent experts'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (eg. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;

- baseline assessment;
- impact assessment;
- cumulative impact
- interaction of impacts
- mitigation.

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of alternatives is a requirement of EIAR

Where tourism projects are location dependent the assessment of alternatives should consider alternative methods and technologies, detail the key considerations culminating in the selection of the design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The developer is expected to consider reasonable alternatives. What is considered reasonable may vary from case to case.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependant on its **Context, Character, Significance, and Sensitivity**, as outlined in the Draft Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or

recognition of such significance should be. Where possible the value of the contribution of such tourism assets and activities to the local economy should be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the Draft Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism assets under the 'material assets' topic below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section.

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impact. Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc. Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on activity proposed and sensitivity of the location.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor but is generally not kept in situ except in key cases which could also be considered under cultural heritage.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets are utilities and infrastructure. Tourism itself could be considered a material asset as its impact upon the economy and the infrastructure in place to support it is a material consideration in assessing economic impact.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A

development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Effects

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIAR Screening Report.

Mitigation

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Authorities

Regional Authorities can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

Edel Mulholland

From: planning applications <planning.applications@failteireland.ie>
Sent: Friday 23 January 2026 09:41
To: Edel Mulholland
Subject: Re: 250709 - Ballydermot Substitute Consent rEIAR - Failte Ireland
Attachments: Fáilte Ireland EIAR Guidelines 2023.pdf

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

Hello Edel,

Thank you for your email regarding scoping documents for a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards & thanks,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86

M +353 (0)86 0357590



[LinkedIn](#) | [Twitter](#) | [YouTube](#) | [Facebook](#)

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday, January 15, 2026 11:20
To: planning applications <planning.applications@failteireland.ie>; Yvonne Jackson <yvonne.jackson@failteireland.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Failte Ireland

[AIRE] Tháinig an teachtaireacht seo ó lasmuigh de Fáilte Ireland. Bí cúramach le hipearnasc, le ceangaltáin agus le treoracha sa ríomhphost seo.

[ATTENTION] This message originated from outside of Fáilte Ireland. Please treat hyperlinks, attachments and instructions in this email with caution.

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

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EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

Contents

1.	Introduction	1
2.	Background to this Document.....	1
3.	Legislation and Statutory Guidance	2
4.	Assessing Tourism	5
5.	Guiding Principles of EIAR	6
6.	Consideration of Competency and Qualifications	6
7.	EIAR Requirements.....	6
	Population and Human Health	8
	Biodiversity	8
	Land, Soils and Geology	9
	Water	9
	Air Quality and Climate	9
	Noise and Vibration.....	9
	Material Assets; Traffic and Transport.....	9
	Cultural Heritage	10
	Archaeology	10
	Material Assets; Waste Management.....	10
	Material Assets	10
	Landscape	10
8.	Sources of information on Tourism	12
	Information available online.....	12

1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide 'An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects' to 'a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

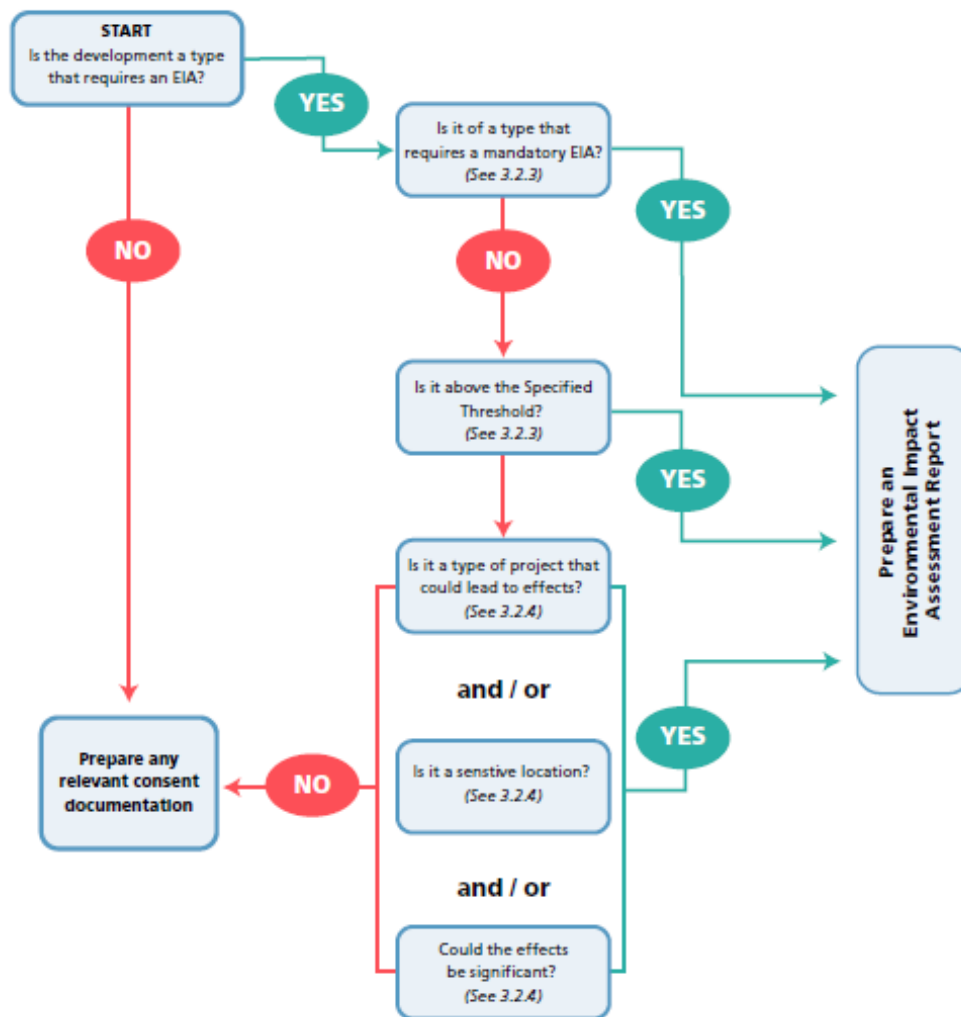
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Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

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Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

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According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

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These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by '*competent experts*'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context, Character, Significance, and Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity “..which may be relevant under ‘Population and Human Health’ and ‘Landscape’”.

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are ‘unspoiled’ can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Impacts

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

Mitigation & Monitoring

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy.

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact.

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. 'The decision to grant development consent shall incorporate at least the following information ...

(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed [here](#). The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed [here](#).

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Assemblies

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

Edel Mulholland

From: GSI Planning <GSIPlanning@GSI.ie>
Sent: Wednesday 9 March 2022 10:39
To: Karen Mulryan
Cc: Clare Glanville; GSI Planning
Subject: RE: EIS 22/49 - rEIA Scoping for peat extraction activities at the Ballydermot Bog Group on the border of Offaly/Kildare
Attachments: 22_49 rEIA Scoping Ballydermot Bog Group.pdf; GSI datasets relevant to EIA & SEA_20210421.pdf

You don't often get email from gsiplanning@gsi.ie. [Learn why this is important](#)

Dear Karen,

With reference to your email received on the 21 February, concerning the rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, please find attached response and dataset sheet from Geological Survey Ireland.

If you have any further queries or if we can be of further assistance, please do not hesitate to contact me Trish Smullen, or my colleague Clare Glanville at GSIPlanning@gsi.ie.

Yours sincerely,

Trish Smullen
Geological Survey Ireland

From: John Butler
Sent: 22 February 2022 08:59
To: Clare Glanville; Sophie O'Connor; Brian McConnell; Monica Lee; Taly Hunter Williams; Sean Cullen; Charise McKeon; Jim Hodgson; Eoin McGrath; Trish Smullen
Cc: GSI Planning
Subject: EIS 22/49 - rEIA Scoping for peat extraction activities at the Ballydermot Bog Group on the border of Offaly/Kildare

EIS 22/49

rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare. Request for observations by MKO. Document is enclosed.

Regards,

John

From: Karen Mulryan [<mailto:kmulryan@mkoireland.ie>]
Sent: 21 February 2022 12:36
To: John Butler
Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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

Good afternoon,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú

an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.



Karen Mulryan
MKO
Tuam Road,
Galway
H91 VW84

09 March 2022

Re: rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

**Your Ref: 191136g
Our Ref: 22/49**

Dear Karen,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 21 February, concerning the rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audits for Co. Kildare and Co. Offaly were carried out in 2005 and 2016 respectively. The full report details can be found at [The Geological Heritage of Kildare](#) and [The Geological Heritage of Offaly](#). **Our records show that there are no CGSs in the vicinity of the peat extraction activities.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. **For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels ([gwlevel.ie](#))).** Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.



The Groundwater Data Viewer indicate several aquifers aquifer classed as a 'Regionally Important Aquifer - Karstified (diffuse)', a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Locally Important Aquifer - Bedrock which is Generally Moderately Productive' underlie the peat extraction activities site boundary. The Groundwater Vulnerability map indicates the area covered is variable.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>.

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68f1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420fc54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b79416093b6b2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dccae.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turlough water levels (gwlevel.ie).	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a991d60c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dccae.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?eastings=7&northings=7&lid=EPA:LEMA_Facilities_Extractive_Facilities
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://www.epa.ie/enforcement/mines/
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f172f754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f172f754

Notes:

- The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
- Please read all disclaimers carefully when using Geological Survey Ireland data
- Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

Edel Mulholland

From: DCEE Planning Notifications <PlanningNotifications@dcee.gov.ie>
Sent: Monday 26 January 2026 16:51
To: Edel Mulholland
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Geological Survey of Ireland
Attachments: 2026.01.26 GSI Submission.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from planningnotifications@dcee.gov.ie. [Learn why this is important](#)

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

Dear Edel,

Please see attached a submission on behalf of Geological Survey Ireland (a section of the Department of Climate, Energy and the Environment) with regard to the subject entity.

Please send an acknowledgement of receipt to PlanningNotifications@dcee.gov.ie at your earliest convenience.

Kind regards,
Luke Thompson

Luke Thompson, Administrative Officer
Planning Advisory Section

An Roinn, Aeráide, Fuinnimh agus Comhshaoil
Department of Climate, Energy and the Environment

Teach Tom Johnson, Bóthar Haddington, Baile Átha Cliath, D04 K7X4
Tom Johnson House, Haddington Road, Dublin, D04 K7X4

M +353 (0)87 336 7599
luke.thompson@dcee.gov.ie

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday 15 January 2026 11:24
To: John Butler (DCEE) <John.Butler@gsi.ie>; Clare Glanville (DCEE) <Clare.Glanville@dcee.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Geological Survey of Ireland

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Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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MKO
Tuam Road,
Galway
H91 VW84

21 January 2026

Re: Bord na Móna Biomass Ltd Substitute Consent Application for Historical Peat Extraction at Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare
Your Ref: 250709
Our Ref: 26/12

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is part of the Department of Climate, Energy and the Environment. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to your email received on the 15 January 2026, concerning the Substitute Consent Application for Historical Peat Extraction at Ballydermot, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [[Data by Environmental Assessment and Planning Topic \(gsi.ie\)](#)], where you will find our data arranged by environmental assessment topic as illustrated below:

Land and soils <i>Soil</i> • Subsoils (Quaternary Geology) • Tellus Geochemistry • Geotechnical <i>Geology</i> • Bedrock • Geophysics • Bedrock & Quaternary 3D	Water <i>Groundwater</i> • Aquifers GW vulnerability, GWPSs (GWPPs) <i>Surface water</i> • Tellus Geochemistry <i>Estuarine & marine waters</i> • Marine and coastal <i>Flooding</i> • GWClimate • Karst	Climate Change <i>Carbon accounting / Carbon balance</i> • Geothermal • Carbon capture and storage <i>Climate change trends</i> • National coastal change assessment
Cultural Heritage <i>Archaeology</i> • Cherish <i>Underwater Archaeology</i> • Shipwrecks	Material Assets <i>Built Services</i> • Natural resources (Minerals & Aggregates) • Active quarries	The Landscape <i>Landscape Appearance & Character</i> • Physiographic units <i>Historical landscapes</i> • Historic mines
Other Relevant Data		
<i>Natural (Geo) hazards</i> • Landslide Susceptibility Mapping • Groundwater flooding • Coastal vulnerability • Subsidence • Radon	<i>Natural heritage</i> • Geoheritage (County Geological Sites) • Dimension Stone/Stone Built Ireland	



Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be redacted for confidentiality and added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.

Edel Mulholland

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: Wednesday 16 March 2022 12:26
To: Karen Mulryan
Cc: CorporateSupport.Unit; Planning Advisory
Subject: Reply from Inland Fisheries Ireland re MKO re 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of Co Offaly and Co Kildare
Attachments: IFI submission to MKO Consultants re substitute Consent application by Bord na Mona for peat extraction Bog of Allen sites top Barrow PDF.pdf

Good afternoon Karen,

Please see attached and below a reply from Mr Donnachadh Byrne (Senior Fisheries Environmental Officer) on behalf of Inland Fisheries Ireland for the subject below.

Please forward an acknowledgement of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience.

Regards,
Enda Brady,
Corporate Support Unit.

Enda Brady,
Corporate Support Unit,

An Roinn Comhshaoil, Aeráide agus Cumarsáide
Department of the Environment, Climate and Communications

Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7
Elm House, Earlsvale Road, Cavan, H12 A8H7

M +35387 623 7714 T +353 (0)1 6782308
CorporateSupport.Unit@decc.gov.ie www.gov.ie/decc

From: Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Sent: Tuesday 15 March 2022 11:54
To: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Subject: FW: MKO re 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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Hello Enda,

Please see attached a copy of IFI response for MKO.

Regards

Donnachadh Byrne
Senior Fisheries Environmental Officer

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel +353 (0)1 8842600
Email donnachadh.byrne@fisheriesireland.ie
Web www.fisheriesireland.ie
3044 Lake Drive, Citywest Business Campus, Dublin 24, Ireland.

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 21 February 2022 12:00
To: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Subject: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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

Good morning,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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MKO
Tuam Road
Galway
H91 VW84

15 March 2022

**Applications by Bord na Mona for Substitute Consent relating to the Ballydermot Bog group in
Counties Kildare and Offaly.
Ref; 2509**

Dear Sir/Madam,

IFI is charged with the protection, conservation and promotion of fisheries within our functional area. Board policy is aimed at maintaining a sustainable fisheries resource through preserving the productive capacity of fish habitat by avoiding habitat loss or mitigating harmful alteration to habitat.

With reference to the maps supplied, the highlighted peatlands fall within the catchment of the Barrow River. The Barrow River is an important Spring Salmon & trout fishery and supports several species listed in Annex II of the Directive including Salmon, River Lamprey, Brook Lamprey, Sea Lamprey, Freshwater Pearl Mussel and Otter. Much of the main channel of the Barrow River and many tributaries are candidate Special Areas for Conservation (SAC) under the European Habitats Directive.

Within the Barrow catchment, the majority of highlighted peatland sites fall within the catchment of the Figile and Slate Rivers.

Salmon spawning/recruitment occurs on the Slate, and Figile, with salmon spawning also recorded on the Cushaling (Figile tributary during Winter 2021-2022). The extent of salmon spawning on these systems is limited by hydro-morphological damage to habitat which was undertaken to facilitate commercial peat harvesting. Until relatively recently however salmon spawning/recruitment in these and other Barrow tributaries draining the Bog of Allen area occurred over a far wider range, with important salmon spawning in the Esker River (Daingean tributary) and throughout much of the Slate Rivers. IFI believe that the restoration of salmon spawning recruitment throughout these Rivers is integral to improving salmon stocks in the Barrow River system.

IFI believe that many of these rivers including the Slate, Figile/Cushaling have potential to be some of the more important salmon spawning/nursery tributaries of the entire Barrow SAC.

The Barrow is a large salmonid system and their importance to populations of species and habitat types listed in the European Habitats Directive is recognized by the fact that much of the main channel and many tributaries of this system has been designated as candidate Special Areas for Conservation (SAC) under the European Habitats Directive.

Adult salmon spawn in shallow waters during the Winter months and the adult salmon that spawn in systems such as the Figile, Slate and Cushaling will have resided in deeper sections of the Barrow main channel prior to entering these waters to spawn. Conversely the progeny of the salmon that spawn in the Figile, Slate and Cushaling system as they grow older and larger will travel downstream to the

deeper waters of the Barrow main channel, before smoltifying and migrating to sea. IFI would like to stress that the populations of salmon (and other Habitats Directive species) in these systems are an important/integral component of the salmon populations of these SACs even though the impacted waters may not be SAC designated.

Section 4 of the MKO document, Overview of Peat Extraction, states, “For a site such as this, the primary land-use change occurs during the initial drainage of the bog in advance of peat extraction. Constructed drainage ditches drain the upper surface of the bog by lowering the local peat water table”. The MKO document makes no reference to the fact that fisheries watercourses flowing through/adjacent to and near the peatlands were deepened/straightened and widened to facilitate the commercial peat harvesting.

Our understanding is that all drainage/maintenance works on several large salmonid barrow tributaries draining the Bog of Allen, such as the Esker, Philipstown/Daingean and Figile was undertaken by Bord na Mona or using machines supplied by Bord na Mona for decades.

IFI request that this document/application address the fact the drainage works to facilitate the commercial peat harvesting here resulted in significant hydromorphological damage to fisheries watercourses flowing through, adjacent to and near the peatland sites and that any long-term plans for these sites must include restoration measures for these important waters.

IFI concerns relating to water quality issues include:

- The WFD Ecological Status/Potential for numerous waters draining these Bord na Mona peatland areas is “Poor”, while for many the WFD Risk calculation is that they are “At Risk”.
- The WFD Characterization Reports for numerous waters draining these Bord na Mona peatland areas identifies peat extraction as a significant pressure, with organic pollution the main impact associated with peat extraction.
- To facilitate peat harvesting deep drainage channels were constructed throughout these sites. Deepening of fisheries water-courses adjacent to and downstream of peatlands was also undertaken to facilitate this peat harvesting. These significant alterations lowered the water table within surrounding peat-lands and result in the associated peat being exposed to air, facilitating the rapid breakdown of this organic matter, releasing nutrients, principally ammonia to waters.
- The drying out of the peats exacerbates the washout of peat solids to surface waters. The potential for peat particles to become windblown is exacerbated by drying out also.
- Silt settlement ponds are used extensively on Bord na Mona properties, but are likely to retain heavier suspended solids only, with limited retention of dissolved nutrients. The ability of a silt settlement pond to retain fine particles depends upon regular maintenance, as it relates to residence time within the pond and as suspended solids settle out in the pond the retention time for water within that cell and the efficiency of the system reduces significantly. The efficiencies of these ponds in relation to their retention time needs to be considered, with a specific focus upon periods of high precipitation.
- Suspended solids pollution of surface waters from working peatland areas is not limited to carry-over from silt settlement ponds, but may occur as a result of direct run-off from haul roads and stockpiles of peat. Wind-blown peat is another significant source. The potential for suspended solids generation from excavations in subsoils below peat deposits should also be considered.

- To date the main water protection/mitigation measure employed by Bord na Mona at peatland sites is the use of silt ponds. Silt ponds do not address the threat of ammonia pollution from working/cut-over peatland areas.
- Peat extraction requires the drainage/pumping of waters from relatively shallow peat deposits. Of concern to IFI is the potential that the temperatures of this drainage water may (at certain times of the year) be significantly elevated when compared to typical groundwater recharge and/or the surface waters to which it is being discharged.
- Following on from the above point, this drainage water is likely to be pumped/flow through a large drainage system which may include multiple, large surface area silt settlement ponds. Given the relatively shallow depth of the silt ponds and potential for full sunlight penetration, IFI have concerns that there is potential for a significant increase in temperatures of this drainage water prior to discharge to surface waters.
- Given the important link between water temperature and biological/biochemical reactions, the temperature of drainage waters being discharged to fisheries streams/rivers is critical in that some key constituents of water, either change their form (ionization of ammonia) or alter their concentration, as with dissolved oxygen. Considering that ammonia losses from drained peatland are the principal water quality issue it is important that this issue be adequately addressed.
- These operations involve significant machinery/plant/light rail infrastructure, throughout. Fuels/hydraulic oils/lubricants etc. have potential to pollute both surface and ground waters. IFI ask that this application address the potential for ongoing/historical surface/ground water pollution at machinery storage/repair-maintenance/refueling locations.
- The Dept. of Agriculture and the Marine document, "Land Types for Afforestation" Working Document 2016, includes former and existing industrial cutaway peatlands as an example of lands unsuitable for afforestation. Commercial afforestation on such peat deposits poses a significant environmental threat to water quality. In addition such afforestation is likely to require the bog drainage system is maintained, leading to continued ammonia run-off to surface water. A significant threat comes from forest harvesting on such sites, especially where such plantations, which are now maturing, have been established prior to the implementation of the Forest Service guidelines. IFI ask if such sites have been included in the maps relating to the 41 bog units supplied and we ask that these applications consider commercial afforestation on all Bord na Mona peatland sites.
- We note that a number of the sites relate to the production of peat and the processing of peat for use in horticulture. Certain aspects of this production are likely to include the addition of nutrient/minerals and other materials to peat. IFI request that the potential for contamination of ground and surface waters by such nutrients/minerals at these facilities be addressed.
- Thermal pollution from the Edenderry Power Plant is of concern to IFI. Given the important link between water temperature and biological/biochemical reactions, the temperature of cooling waters being discharged to fisheries rivers is critical in that some key constituents of water either change their form (ionization of ammonia) or alter their concentration, as with dissolved oxygen. Considering that the ammonia losses from drained peatland are the principal water quality issue and the extensive peat workings on both sides of the Figle River for some considerable distance upstream, it is important that this issue be adequately addressed.
- Relating to the above point the section of the Cushaling River (upstream of Edenderry Power Plant) in County Kildare represents some of the best salmonid habitat within the Figle catchment. This potential was underutilized because of a number of water quality issues, including run-off from peat-lands. IFI do however hope that fish stocks in this section of channel

will improve significantly, and salmon spawning was recorded in the Cushaling River during the Winter 2021-2022. IFI believe that the improvements in water quality referred to above will lead to the expansion of salmon spawning in the Cushaling River, and that these Cushaling salmon will be an important/integral component of the salmon populations of the Barrow SAC.

- The addition of biocides to cooling waters at power generation plants to prevent biofouling of their cooling systems is a widespread practice internationally. With reference to the Edenderry Power Plant IFI request that this EIAR address if such practices are undertaken at this facility.
- In relation to the above point, trihalomethanes (THMs), a large group of organic compounds are formed when organic material reacts with chlorine. Given the high organic content of the Figile River water (from which the Edenderry power plant abstracts cooling water) linked to extensive Bord na Mona peatlands through which the Figile and its tributaries flow, IFI have concerns regarding the potential for significant discharges of THMs to the Figile River. IFI request that the potential for negative impacts upon the aquatic biota of the Figile River by discharges of THMs be addressed in this EIAR.
- The potential for large scale fires on cut-over/"peatlands being worked" is significantly greater compared to sites that have not been subject to drainage/drying out or sites that have been re-wetted. IFI request that the potential for run-off of significant quantities of deleterious matter to surface waters following a large scale fire on cut-over peatland, and the likely makeup of the run-off be considered.
- The use of borrow pits/quarrying on Bord na Mona peatland sites may lower water levels within surrounding peats and act to exacerbate drying out of such peats, with an increase in release of ammonia to surface waters. Quarrying operations also represent a potential source of suspended solids pollution of surface waters.

IFI concerns relating to habitat/hydro-morphology include:

- An examination of OSI 6 & 25 inch sheets highlight significant modifications to watercourses flowing through, adjacent to and downstream of these peatland sites. The modifications noted (through both desktop checks and on-site visits) included:
 - Realignment/Straightening
 - Deepening
 - Widening
 - Culverting/piping of waters
 - Construction of on-line silt ponds to facilitate commercial peat extraction.
 - Differences in height where waters are lifted to facilitate drainage
- Realignment/straightening of watercourses is problematic for a number of reasons including the fact that it results in a net loss of habitat. Realignment of channels often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. Realignment may also negatively impact upon gravel recruitment at the realigned site and in waters downstream.
- The deepening of watercourses in, or adjacent to peatland sites, (in addition to the release of ammonia and suspended solids to surface waters) may result in the removal of all/most gravels from long stretches of fisheries waters where the excavation depth extends down to the subsoils beneath the watercourse. In such cases the potential for natural restoration in waters flowing through peatland areas is usually limited, given the relatively low gradient and other

hydro-morphological issues referred to in the above point. **Human intervention is likely to be necessary to facilitate recovery of the fisheries habitat on long stretches of watercourses draining peatland areas.**

- The widening of watercourses, (regularly associated with realignment and deepening) often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. In shallow waters a braided channel with limited depth for fish to reside is often the result, while in deeper waters an over-abundance of aquatic plants clogging the channel is regularly encountered.
- Culverting is potentially damaging to fisheries waters as it may (1) block/impede the free passage of fish, (2) result in a loss of fisheries habitat and (3) hinder the detection of pollution. Our experience is that many of the culverts on Bord na Mona peatlands to facilitate the industrial light rail system are very long. The depth at which such culverts were installed also acts as a control re drying out of peats, as all peats upstream of the culvert at a higher elevation will be subject to drying out.
- Construction of on-line silt ponds results in a loss/degradation of fisheries habitat. The efficacy of any silt pond relates to residence time in the pond and as peat settles out in the pond the ability for the pond to retain peat is reduced. Because of this, these ponds are subject to regular maintenance whereby accumulated peat deposits are removed.
- Pumping operations and flow control weirs have potential to impact on both upstream and downstream fish passage, watercourse base flows and water quality. We request that this application address these issues.
- IFI have noted significant gradient differences on watercourses on peatland sites where water is lifted from one to the other using archimidean screws. Such practices represent a barrier to the free passage of fish.
- With reference to the Edenderry Power Plant and any other Bord na Mona industrial facility IFI request that any abstractions from surface waters and/or groundwater be considered with a focus upon potential impacts on flow rates in associated surface waters and also recharge of groundwater to surface water bodies.
- With reference to the Edenderry Power Plant and any other Bord na Mona industrial facility that includes an abstraction from surface waters, the issue of screening to prevent fish and other aquatic animals becoming entrained within the abstracted water and/or impinged upon screens should be addressed. Of particular concern is the potential for significant mortalities, where fish become trapped on screens and/or enter cooling water systems. Numerous factors influence the likelihood of fish mortality at/in such sites including, but not limited to:
 - Flow velocity in the vicinity of screen
 - Rate of abstraction relative to total flow in river/flow attraction
 - Screen spacing
 - Size of fish resident and migrating through the location
 - Potential for screens to become clogged which is likely to increase flow velocities in the vicinity of screen
 - Angle of the screen
 - Surface area of the screen
- IFI consider that any abstraction should protect all age classes of all fish species resident within the area of the abstraction or likely to migrate through that section of watercourse.

IFI is keen to build on recent water quality improvements in the Black River, which drains 21% of the Barrow River catchment and to restore and increase populations of salmon over large sections of this system.

Many of the watercourses draining directly from Bord na Mona peatland sites have small catchment areas with limited flows, and should be regarded as highly sensitive to anthropogenic inputs/alteration. Other larger and important fisheries watercourses flow through, adjacent to and downstream of the Bord na Mona sites and while many of these represent excellent fisheries habitat, in many cases the habitat of these watercourses has been degraded by deepening/widening, realignment and silt deposition.

IFI request that this application include the hydro-morphological damage to watercourses flowing through, adjacent to and near the Bord na Mona sites which facilitated the peat extraction and that they include/address long-term plans for habitat restoration of these important waters.

IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that *“the main aim of rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon”*.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24

Please note, Inland Fisheries were contacted again on the 15th January 2026. At this time of writing, MKO have not receive a response of acknowledgment. A response was received on the 11th of February 2026 by Inland Fisheries is relation to the Proposed Ballydermot Wind Farm, Co, Kildare and Co. Offaly. We have included their response below for reference.

Aisling Thompson
MKO, Environmental Consultants
Tuam Road
Galway
H91VW84

08 December 2025

EIAR scoping re BnM Powergen Ltd re Ballydermot Windfarm, Counties Kildare and Offaly.

Dear Ms. Thompson,

IFI is charged with the protection, conservation and promotion of fisheries within our functional area. Board policy is aimed at maintaining a sustainable fisheries resource through preserving the productive capacity of fish habitat by avoiding habitat loss or mitigating harmful alteration to habitat.

The site of this significant proposed development is located primarily within the upper reaches of the Figile River system with smaller sections located within the Slate catchment.

The Figile and Slate River are two of the four Barrow tributaries (Figile, Cushina, Philipstown/Daingean & Slate), draining large peatland areas in the Bog of Allen which combined are known as the Black River system. The Black River, which joins the Barrow immediately upstream of Monasterevin is by far the largest tributary of the Barrow system draining, 622km² and represents 21% of the entire Barrow catchment.

Salmon spawning/recruitment within the Black River is currently limited to small sections of the four tributaries referred to above. Until relatively recently, however, salmon spawning in the Black River system occurred over a far wider range, with excellent salmonid habitat throughout the four tributaries. IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC.

The Barrow is a large 3000km² SAC system and is the sixth largest catchment in Ireland in terms of fluvial habitat accessible to salmon. Among the qualifying interests for the Barrow-Nore SAC are Atlantic Salmon and Lamprey species. Regarding Atlantic Salmon, the Barrow consistently fails to reach its Salmon Conservation Limit. The Conservation Limit (CL) is the minimum number of adult spawning fish required to maintain a healthy and sustainable stock in a river. Since 2015, the salmon population has consistently fallen below 20% of the CL and is currently 12%.

The table below shows the percentage of the salmon conservation limit achieved in the Barrow from 2011 to 2022, indicating the status of salmon stocks in the catchment. The Suir and Nore are displayed for comparison.

Table 1. Percentage of CL by River by Year

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Barrow	40	41	29	29	17	18	18	17	16	15	14	14

Nore	129	140	153	121	91	60	70	77	80	84	84	68
Suir	116	112	117	83	80	68	79	100	102	102	91	60

The reason that the Barrow numbers are so much lower than the Suir and Nore relates mainly to extensive hydro-morphological damage to the upper/mid catchment of the Barrow where significant loss and degradation of habitat occurred due to extensive widening and deepening of watercourses by the Barrow Drainage Board/Bord na Mona. Because of this damage most of the system now produces little or no salmon and other important native fish species.

Adult salmon spawn in shallow waters during the Winter months and the adult salmon that spawn in systems such as the Figile and Slate will have resided in deeper sections of the Barrow main channel prior to entering the Black River system to spawn. Conversely the progeny of the salmon that spawn in the Figile and Slate system as they grow older and larger will travel downstream to the deeper waters of the Barrow main channel, before smoltifying and migrating to sea. IFI would like to stress that the populations of salmon (and other Habitats Directive species) in these rivers/streams are an important/integral component of the salmon populations of the Barrow River SAC even though those waters are not SAC designated.

IFI have recorded salmon spawning at several locations along the Cushaling River within the area covered by this EIAR scoping. Turbine development is proposed near sections of channel that represent excellent salmonid spawning/nursery habitat.



Large salmon redd recorded on section of the Cushaling River within study area December 2024, salmon spawning recorded at other locations on Cushaling upstream and downstream of here.

In addition to salmon spawning being recorded over long sections of the Cushaling, checks throughout the Crabapple River system have highlighted excellent salmonid habitat on sections of channel there, specifically the Lugherra tributary where habitat restoration has occurred naturally. Inspections of the Lugherra highlight that it was previously subject to very significant deepening and widening but unlike most other channels here, maintenance dredging/cleaning ceased decades ago. As a result significant

terrestrial woodland on the lands bordering the River has developed and the river here has recruited gravels from the bank/subsoils back to this river. IFI believe the Lugherra River highlights the potential for river/riparian habitat restoration throughout the entire study area.



Section of Lugherra River (Crabapple and Figile tributary), where habitat restoration has occurred naturally, with salmonid riffly habitat and excellent flow velocities evident.

Checks by IFI throughout this study have highlighted significant loss of fisheries habitat linked to the previous land use here, where long sections were subject to hydro-morphological damage because of over-deepening and over-widening. In addition to this throughout the study area IFI inspections of watercourses here have identified multiple on-line silt traps, with several such traps in succession noted on the lower reaches of the Crabapple River and with additional silt traps in the upper reaches of this small catchment. IFI have noted multiple on-line silt traps on watercourses flowing throughout the study area. The purpose of these silt traps was to settle out the very fine peat solids associated with commercial peat harvesting here. The scale of deepening and widening on these on-line silt ponds is such that there is no realistic potential for natural habitat restoration of these important watercourses and for this to happen human intervention will be necessary.

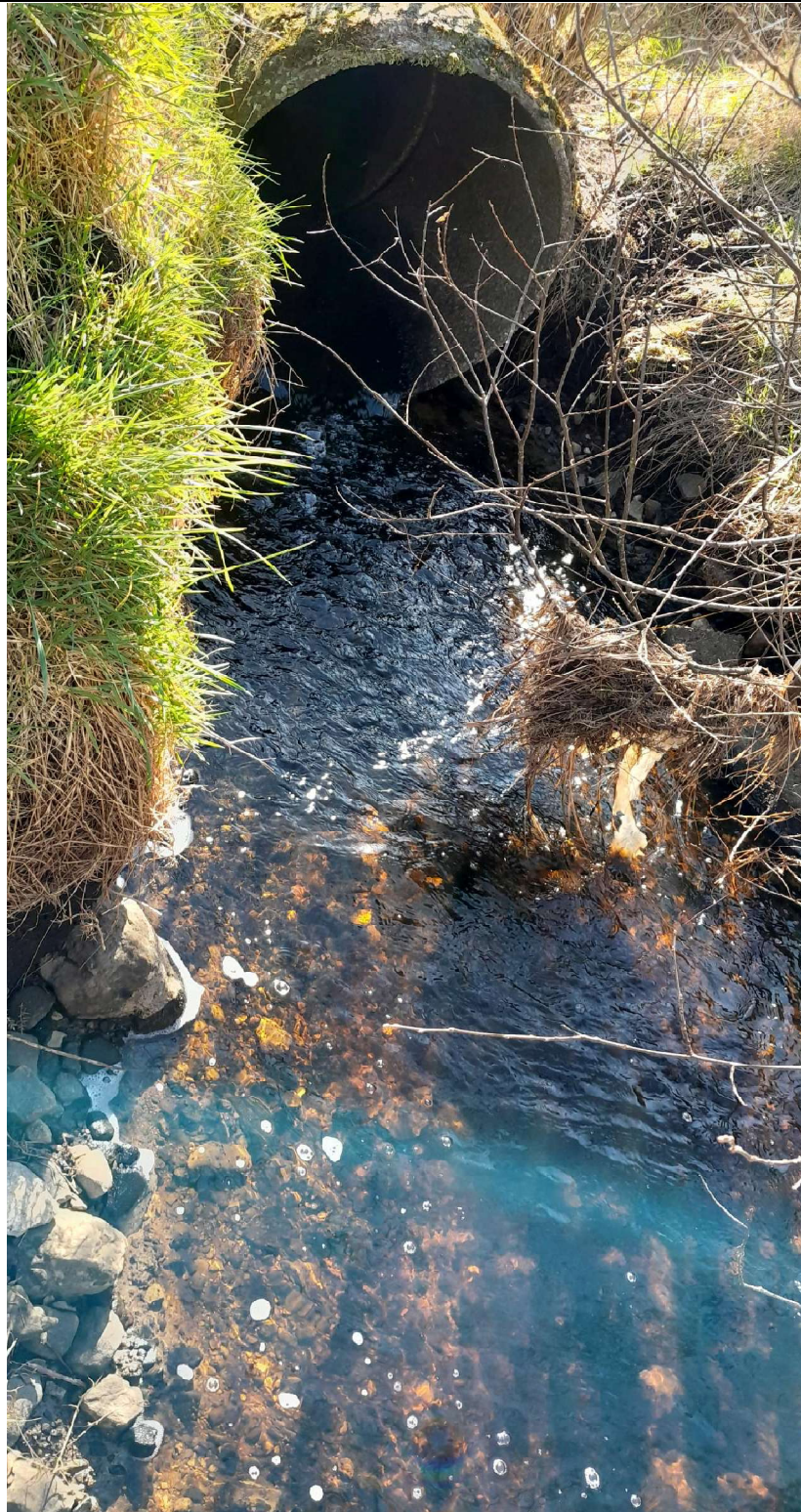


One of several on-line silt ponds on lower reaches of Crabapple River, other large on-line silt ponds are located in the upper reaches of the Crabapple River & on watercourses throughout study area.

IFI inspections have noted significant fisheries habitat loss within the study area on the Crabapple River system where all flows from the upper reaches of the Crabapple River were diverted across Lullybeg bog to the lower reaches of the Lugherra river. The net result of this is a significant loss of fisheries habitat wetted area and deterioration of the habitat of most of the Crabapple River, with no potential for this habitat to restore naturally. IFI believe that in addition to habit restoration of the Crabapple River, restoring these waters to their original channel could provide significant flood storage.

Inspections here have also highlighted habitat loss relating to the culverting of watercourses. In many cases, the extent of habitat loss linked to culverting is relatively short linked to culverts which facilitate wide access roads and light industrial rail.

IFI checks of the Glashabaun River (Cushaling tributary) however, highlighted that almost all this tributary had been lost through culverting through the cut-over peatland, with only a few short openings along the entire channel of this watercourse. A long section of the Duke's River (Crabapple tributary) was also noted to have been piped also. See below photo of one short open section of the Glashabaun River highlighting the riffly/gravelly habitat of this watercourse.



Short open section of the Glashabaun River, approx. 250m upstream of the Cushaling river, highlighting salmonid fisheries habitat. IFI estimate over 1km of the Glashabaun River has been culverted.

IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that *“the main aim of rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon”*.

IFI is keen to build on recent water quality improvements in the Black River, which drains 21% of the Barrow River catchment and to restore and increase populations of salmon and other native fish species over large sections of this system.

Given the scale of this project there is a unique opportunity to showcase multiple river and terrestrial habitat restoration techniques focusing upon the watercourses within the study area and to make this restoration a central pillar of the project.

The expansion of spawning by iconic species such as Atlantic Salmon within the study area is critical to Ireland achieving its requirements under the European Habitats Directive and the Water Framework Directive.

We believe that a commitment to make habitat restoration a central pillar of this project could serve as a template for future habitat restoration works necessary to fulfill Ireland’s obligations under EU Nature Restoration Law at similar sites.

Inland Fisheries Ireland ask that habitat restoration which addresses the concerns raised above throughout the proposed development area is central to this wind-farm development.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24

Edel Mulholland

From: IWT Info <info@iwt.ie>
Sent: Tuesday 22 February 2022 11:36
To: Karen Mulryan
Subject: Re: 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

Dear Karen,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,
Fabiola Vieira

On Mon, 21 Feb 2022 at 12:46, Karen Mulryan <kmulryan@mkoireland.ie> wrote:

Good afternoon,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIA) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

MKO

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Ireland, H91 VW84

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Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2

Registered Charity (CRA) Number: 20010966

Facebook: IrishWildlifeTrust

Twitter: @irishwildlife

Phone: 01 445 7259

Edel Mulholland

From: IWT Info <info@iwt.ie>
Sent: Monday 19 January 2026 09:17
To: Edel Mulholland
Subject: Re: 250709 - Ballydermot Substitute Consent rEIAR - Irish Wildlife Trust

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Edel,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,
Fabiola Vieira

On Thu, 15 Jan 2026 at 14:09, Edel Mulholland <emulholland@mkoireland.ie> wrote:

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,

Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

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Edel Mulholland

From: Colm Flynn <CFlynn@kildarecoco.ie>
Sent: Monday 14 March 2022 11:05
To: EIAPanning
Cc: Lorraine Kennedy; Gavin McDermott; Helen Doyle
Subject: RE: [CASE: KCC-108834] - EPA request CRM:00246000000039
Attachments: Letter of Response to EPA re Scoping Report for EIAR.pdf

Dear Sir/Madame,

Please see attached Kildare County Council Env Dept's response as per your request regarding the EIAR Scoping Report prepared by Tobins on behalf of BnM. Please revert to me directly if you have any further queries.

Regards,

Colm Flynn
Senior Executive Engineer
Environment Dept
Kildare County Council
086-8246436
045-980966

From: CustomerService <customerservice@kildarecoco.ie>
Sent: Thursday 3 March 2022 13:26
To: Colm Flynn <CFlynn@kildarecoco.ie>
Subject: [CASE: KCC-108834] - EPA request CRM:00246000000039

Hi Colm,

Please see below which has been received in via CRM.

Best regards,

Lorraine

----- Original Message -----

From: Leo Sweeney <eiapanning@epa.ie>;
Received: Wed Mar 02 2022 15:32:04 GMT+0000 (Greenwich Mean Time)
To: customerservice@kildarecoco.ie <customerservice@kildarecoco.ie>; Phoebe Duvall <planning@antaisce.org>; Customer Services <customerservice@kildarecoco.ie>; wppr@dcae.gov.ie; corporatesupport.unit@dcenr.gov.ie; minister@dtas.ie; John.Spink@teagasc.ie; bord@pleanala.ie; aharvey@heritagecouncil.ie; Fem.dau@housing.gov.ie; environmentalco-ordination@agriculture.gov.ie; planning.applications@failteireland.ie; chemicals@hsa.ie; environmental.health@hse.ie; environlicensing@fisheriesireland.ie;
Subject: EIA Scoping Consultation under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended- Drehid Waste Facility

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Re: EIA Scoping Consultation under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended

Dear Sir/Madam,

The Environmental Protection Agency (EPA) received a request for a written opinion on the scope and level of detail of the information to be contained in an Environmental Impact Assessment Report (EIAR). I refer to the attached scoping correspondence received by the EPA on 22/02/2022 in respect of the following.

Name of applicant: Bord na Móna PLC

Location of Activity: Drehid Waste Management Facility, Killinagh Upper, Carbury, Co. Kildare.

*Class and Nature of Activity: Class 11 of the EPA Act.

Reference No. 2510

You are being consulted under Section 83(2A)(de) of the Environmental Protection Agency Act 1992, as amended. Please revert to the Agency with your comments on the scope and level of detail of the information to be included by the developer in the EIAR within **two weeks** of the date of this email.

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

Yours faithfully,
Environmental Licensing Programme

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



053-916 0600 (Switch)

eiaplanning@epa.ie

www.epa.ie



*Class/es may change

From: John Staunton <john.staunton@tobin.ie>
Sent: Tuesday 22 February 2022 16:11
To: EIAPPlanning <eiaplanning@epa.ie>
Subject: 11290 - Scoping - Drehid Planning Application

Dear Sir/Madam,

Please see attached cover letter and EIAR scoping document for a proposed development at the Drehid Waste Facility in Co. Kildare.

Kind regards,

John

Dr. John Staunton B.Sc. PhD.

Senior Project Manager & Environmental Scientist

TOBIN Consulting Engineers
Galway | Dublin | Castlebar
Telephone: +353 91 565211
Email: john.staunton@tobin.ie
Website: <http://www.tobin.ie>



2020 Association of Consulting Engineers of Ireland Awards Winner: Project Management
2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)
2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year
2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

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Tá an ríomhphost seo príobháideach agus ní ceadmhach úsáid an ríomhphoist seo d'éinne ach don té ar seoladh chuige é. D'fhéadfadh go mbeadh eolas ann atá faoi phribhléid agus rúnda de réir an dlí. Munar duit an ríomhphost seo, déan teagmháil leis an seoltóir chomh luath agus is féidir. D'fhéadfadh nach iad tuairimí Chomhairle Contae Chill Dara na tuairimí atá curtha in iúl sa ríomhphost seo. Déanann Comhairle Contae Chill Dara iarracht ríomhphoist a chosaint ó víris. Mar sin féin, moltar duit gach ríomhphost a scanadh, mar ní ghlacann an Chomhairle aon dliteanas i leith damáiste do do chórais. Le haghaidh eolas ar do chearta príobháideachta agus ar conas a bhainistimid sonraí pearsanta, logáil isteach ar

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***** Our Website kildarecountycouncil.ie 'Follow' us on Twitter - 'Like' us on Facebook

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D'fhéadfadh nach iad tuairimí Chomhairle Contae Chill Dara na tuairimí atá curtha in iúl sa ríomhphost seo. Déanann Comhairle Contae Chill Dara iarracht ríomhphoist a chosaint ó víris. Mar sin féin, moltar duit gach ríomhphost a scanadh, mar ní ghlacann an Chomhairle aon dliteanas i leith damáiste do do chórais. Le haghaidh eolas ar do chearta príobháideachta agus ar conas a bhainistimid sonraí pearsanta, logáil isteach ar

<https://kildare.ie/CountyCouncil/YourCouncil/GovernanceandCompliance/DataProtection/> Chun do chuid sonraí pearsanta a nuashonrú cuir ríomhphost chugainn ag customercare@kildarecoco.ie Caithfidh tú deis a thógáil don Chomhairle cé thú féin a chinntiú trí cruthúnas céannachta agus/nó seoladh a sholáthar, sula ndéanaimid aon athruithe.

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Date: 14th March 2022

To: Environmental Licensing Program Team, EPA
Re: EIA Scoping Consultation – Bord na Mona Plc Drehid

Dear Sir / Madame,

Please find as follows comments from Kildare County Council Environment Dept in terms of the scope and level of detail of the information included by the developer in the EIAR:

1. The Plan needs to take into account the Water Framework Directive, and in particular the 3rd Cycle River Basin Management Plan 2022-2027 and how major infrastructure such as this will not impact on Water Bodies in the area. These very important documents do not seem to have been referenced at all.
2. The proposed Facility and associated infrastructure are located within the Figile_010 and Abbeylough__010 waterbodies/sub-basins (Barrow catchment). These are upstream waterbodies/sub-basins of the Figile_020 waterbody/sub-basin. The status of these waterbodies is currently less than “Good” status with EPA biological assessments reporting Q3 and Q3-4 ratings at monitoring stations RS14F010050 (Br. S of Ticknevin) and RS14F010100 (Cushaling Br.) in 2020 respectively. It is necessary to assess the potential for further impact on these waterbodies and in particular any potential for siltation and/or enrichment of receiving waters during the construction phase and any future operational phase. All surface water features within the area of the site shall be properly surveyed and mapped showing any connectivity with the Figile and Abbeylough waterbodies. The location and details of any proposed mitigation/controls for the purpose of minimising impact on surface water/groundwater shall be provided. A developer shall not, in the performance of its functions, undertake those functions in a manner that knowingly causes or allows deterioration in the chemical status or ecological status of a body of surface water.
3. While it is noted that Section 4 advises that the EIAR will include for a review of the “*Waste Action Plan for a Circular Economy*”, it is more important that the proposed development actually takes into account the main principles of the new NWMP in terms of the need to reduce the volume of waste being produced, rather than merely planning around the landfilling of current waste levels.
4. Section 8.0 should also look at the potential increase in ammonia discharging to the surface waters as a result of peatlands, and
5. Section 9.0 should also include odour and dust assessment reporting with recommendations

Regards

A handwritten signature in blue ink, appearing to read 'Colm Flynn', positioned above a horizontal line.

Colm Flynn
A/Senior Engineer
Environment Dept
045-980588
086-8246436

Edel Mulholland

From: Fathalla Ibrahim <FIbrahim@kildarecoco.ie>
Sent: Wednesday 21 January 2026 11:48
To: Edel Mulholland; Darren Hughes
Subject: FW: Email received

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Edel

See comments received below from the Senior Executive Engineer Darren Hughes responsible for water

F Ibrahim Bargouthi
Senior Engineer (CEng)
Environment Department,
Kildare County Council,
Áras Chill Dara, Devoy Park, Naas, Co. Kildare W91 X77F



From: Darren Hughes <Dhughes@kildarecoco.ie>
Sent: Tuesday 20 January 2026 15:43
To: Colm Flynn <CFlynn@kildarecoco.ie>; Fathalla Ibrahim <FIbrahim@kildarecoco.ie>
Cc: Paul Dennis <pdennis@kildarecoco.ie>
Subject: RE: Email received

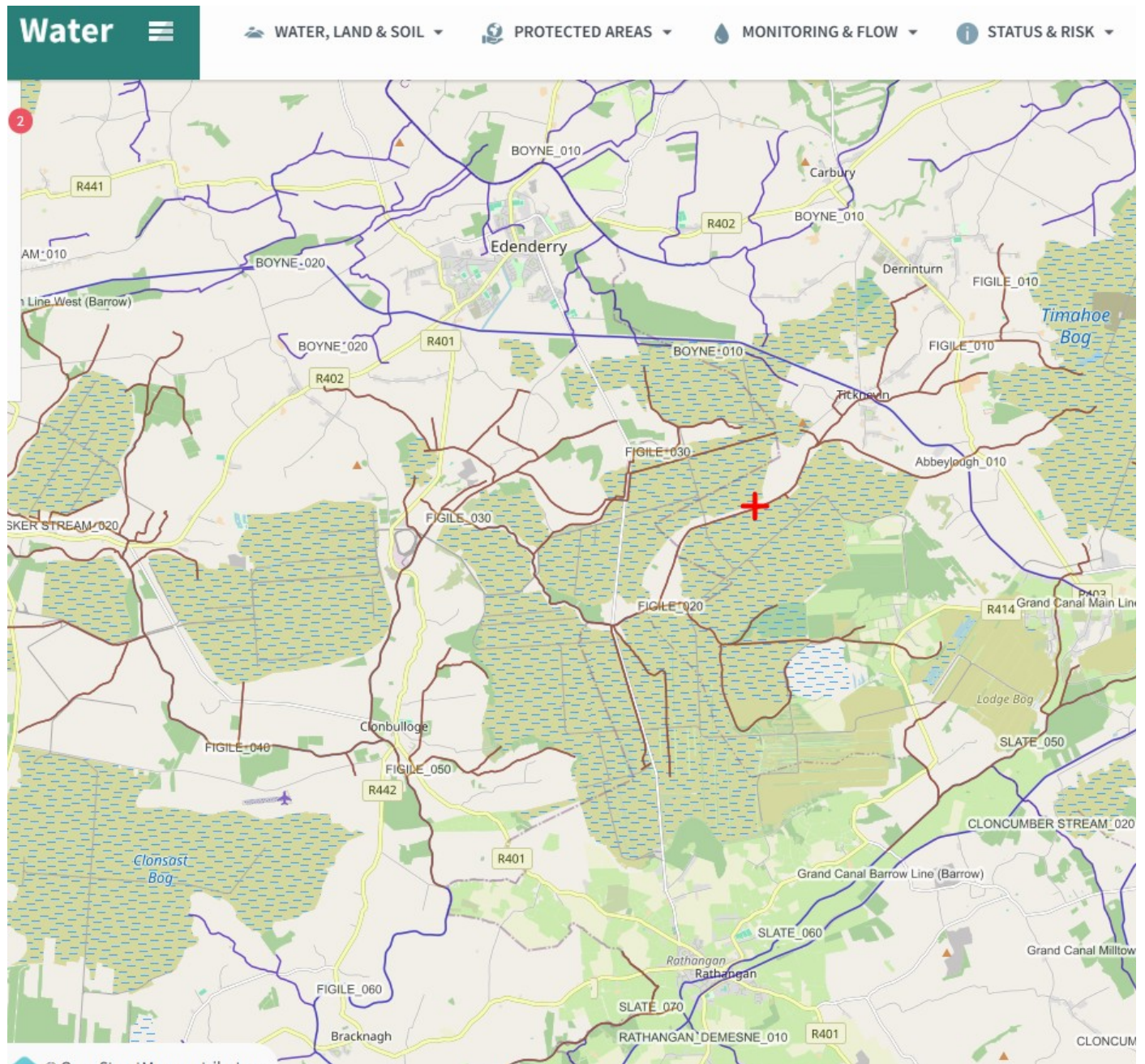
Had a look over...

A big impact on surface waters associated with peat extraction is the release of sediment (suspended solids) which can build up on the bed of streams and rivers and impact on fish spawning beds and habitats for macroinvertebrates. It can also affect the chemistry of water due to increased ammonium concentrations which can be toxic to fish. Also, similar to forestry, pH levels can also be lowered by peat (acidification). Rewetting and blocking drainage channels to prevent discharges and sediment release will help to reduce these impacts.

They are required to monitor water quality under their IPC licence which includes a specific ELV for suspended solids along with the monitoring of other parameters so they should have a lot of historical monitoring data available to them in terms of what has been discharged.

Although there are some references to water quality in the report, I don't see a specific intention by them to further assess water quality impacts in any great detail for the period since 1988 or to include an assessment of possible future negative impacts on water quality in adjacent waterbodies based on the future use of the lands.

I think there is a need for them to expand their works in the area of Water Quality as extractive industries (Peat) have been identified as a significant pressure by the EPA in the waterbodies in this part of County Kildare as indicated below in the EPA mapping (coloured brown) such as Figile_020, Figile_030, Figile_050, Slate_050, Boyne_010.



Section 3.2.1.2 of the report refers to KCC's CDP 2023-2029, particularly the areas contained within Volume 1 Chapter 7 Energy & Communications which relate to Climate Adaptation and Mitigation, Renewable Energy, Wind Energy, Peatlands and Resilient Economy.

For some reason they don't refer to Volume 1 Chapter 6 Infrastructure & Environmental Services which contains a number of objectives related to Water Quality and Pollution – these should be referenced and included in their assessment.

They state that their intention is to retrospectively look at the impact of Peat Extraction on the environment since 1988 and any potential future impacts relative to the remediation works.

Section 5.2.4.8 of the report refers to Hydrology and Hydrogeology and 'water quality assessments' but there might be a case to include a separate Chapter within the report which deals with Water Quality impacts (past and future) and current or future risks to Water Quality.

The connectivity between the bogs and adjacent or nearby waterbodies needs to be considered in terms of the past and planned future use of the bogs.

I also didn't see any mention of past or the current River Basin Management Plan(s) within the report which is a major omission.

Peat Extraction has impacted on water quality historically so the process to re-wet and rehabilitate the bogs and the installation of renewable energy on bogs needs to be assessed to identify and mitigate/avoid any potential negative impacts on water quality.

Regards,

Darren Hughes BA BAI NCEA Dip Eng MIEI CEng

Senior Executive Engineer

dhughes@kildarecoco.ie

Environment Department,

Kildare County Council,

Áras Chill Dara, Devoy Park, Naas, Co. Kildare W91 X77F

Chartered Engineer **CEng MIEI** - Engineers Ireland



Kildare County Council
Comhairle Contae Chill Dara



From: Edel Mulholland <emulholland@mkoireland.ie>

Sent: Thursday 15 January 2026 14:13

To: KCC <KCC@kildarenrdo.com>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>

Subject: 250709 - Ballydermot Substitute Consent rEIAR - KCC Roads Department

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

Edel Mulholland

From: Amy Granville <Agranville@kildarecoco.ie>
Sent: Monday 19 January 2026 13:25
To: Edel Mulholland
Cc: Karen O'Neill; Robert Kennedy
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - KCC Planning Department

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Hi Edel

Thank you for your email. I do not have any remit in Development Management, which your query refers.

I would suggest contacting planning@kildarecoco.ie

Regards

Amy Granville | MIPI | Senior Planner | Forward Planning, Heritage & Nature | Planning Department | Kildare County Council | Áras Chill Dara | Devoy Park | Newbridge Road | Naas | Co. Kildare | Ireland | W91X77F
Direct: +353 45 980507 | **Switch:** +353 45 980200
Email: agranville@kildarecoco.ie | **Web:** www.kildarecoco.ie

It may suit me to send emails outside of my normal working hours. If this is the case I do not expect a response or action from you outside of your working hours.



From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Monday 19 January 2026 10:26
To: Amy Granville <Agranville@kildarecoco.ie>
Cc: Karen O'Neill <koneill@mkoireland.ie>; Robert Kennedy <rkennedy@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - KCC Planning Department

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Warning from Kildare County Council IT Department
CHECK.

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Hi Amy,

Your contact details were forwarded to me by the Roads Department. Please see below, thank you.

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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Edel Mulholland

From: Fathalla Ibrahim <Fibrahim@kildarecoco.ie>
Sent: Monday 19 January 2026 10:17
To: Edel Mulholland
Subject: Ballydermot Substitute Consent rEIAR - KCC Roads

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Hi Edele

This is a matter for planning Department , I suggest you refer it to the Senior Planner Amy Granville Agranville@kildarecoco.ie

F Ibrahim Bargouthi
Chartered Engineer
Senior Engineer
Water Operation
Water Services Department
Kildare County Council
Phone:045-980374
fibrahim@kildarecoco.ie



Tá an ríomhphost seo príobháideach agus ní ceadmhach úsáid an ríomhphoist seo d'éinne ach don té ar seoladh chuige é. D'fhéadfadh go mbeadh eolas ann atá faoi phribhléid agus rúnda de réir an dlí. Munar duit an ríomhphost seo, déan teagmháil leis an seoltóir chomh luath agus is féidir. D'fhéadfadh nach iad tuairimí Chomhairle Contae Chill Dara na tuairimí atá curtha in iúl sa ríomhphost seo. Déanann Comhairle Contae Chill Dara iarracht ríomhphoist a chosaint ó víris. Mar sin féin, moltar duit gach ríomhphost a scanadh, mar ní ghlacann an Chomhairle aon dliteanas i leith damáiste do do chórais. Le haghaidh eolas ar do chearta príobháideachta agus ar conas a bhainistimid sonraí pearsanta, logáil isteach ar <https://kildarecoco.ie/YourCouncil/GovernanceandCompliance/DataProtection/> Chun do chuid sonraí pearsanta a nuashonrú cuir ríomhphost chugainn ag customercare@kildarecoco.ie Caithfidh tú deis a thógáil don Chomhairle cé thú féin a chinntiú trí cruthúnas céannachta agus/nó seoladh a sholáthar, sula ndéanaimid aon athruithe.

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Edel Mulholland

From: Edel Mulholland
Sent: Thursday 16 April 2026 16:44
To: planning@kildarecoco.ie
Cc: Karen O'Neill
Subject: 250709 - Ballydermot Substitute Consent rEIAR - KCC Planning Department
Attachments: Scoping Doc Cover Letter 2025 - F - 2026.01.15 - 250709 - KCC Planning Department.pdf; Ballydermot Subcon Scoping 2025 - F - 2026.01.15 - 250709.pdf

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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Edel Mulholland

From: Customer Service <customerservice@kildarecoco.ie>
Sent: Wednesday 17 June 2026 12:39
To: Karen O'Neill
Subject: [Request Received] – 250709 - Ballydermot Substitute Consent rEIAR - KCC Planning Department - KCC-250846 Acknowledgement from Kildare County Council Customer Services CRM:00001000865154

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Comhairle Contae Chill Dara
Kildare County Council

Thank you for contacting Kildare County Council.

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You will receive a further email in due course with details of the Team and Department your case has been assigned to.

In any communication with us please always include your case number as this helps us to more easily identify your case.

Should you wish to follow up on, or add further information relating to your query, please reply to this email, without altering the subject line as the case number automatically recognises your case in our system.

Submissions:

It is important to note that submissions to Consultations cannot be accepted through the customer services email address or the Customer Portal.

Submissions may be made via the online portal at <https://consult.kildarecoco.ie/en> or in writing to the contact advertised in the consultation. Please make your submission by one medium only i.e. in hard copy or online.

Late submissions will not be accepted.

Go raibh maith agat as ucht teagmháil a dhéanamh le Comhairle Contae Chill Dara.

Fuarthas do ríomhphost agus is é an uimhir thuas d'uimhir cháis.

Gheobhaidh tú ríomhphost in am agus i dtráth le sonraí na Foirne agus na Roinne a mbeidh faoi chúram do chás Iarrtar ort le do thoil d'uimhir cháis a chuir i ngach chomhfhreagras/ cumarsáid linn toisc go gcuidíonn sé seo linn do chás a aithint go héasca.

Más mian leat do saincheist a fhiosrú nó tuilleadh eolais maidir le do saincheist a chuir ar fáil, freagair ar an ríomhphost seo gan an líne ábhair a athrú toisc go n-aithríonn an uimhir cháis go huathoibríoch do chás in ár gcóras.

Aighneachtaí:

Tá sé tábhachtach go dtabharfar faoi ndeara nach féidir glacadh le comhchomhairlí tríd seoladh ríomhphost na seirbhísí custaiméara nó tríd an Tairsí Custaiméara.

Is féidir aighneachtaí a dhéanamh tríd na tairsí ar líne ar

<https://consult.kildarecoco.ie/ga> nó i scríbhinn chuig an teagmhálaí a bhfógraíodh sa chomhchomhairle. Iarrtar le do thoil go ndéantar an aighneacht trí aon mheán amháin, is é sin le cruachóip nó ar líne.

Ní ghlacfar le haighneachtaí déanacha.



Tá an ríomhphost seo príobháideach agus ní ceadmhach úsáid an ríomhphoist seo d'éinne ach don té ar seoladh chuige é. D'fhéadfadh go mbeadh eolas ann atá faoi phribhléid agus rúnda de réir an dlí. Munar duit an ríomhphost seo, déan teagmháil leis an seoltóir chomh luath agus is féidir.

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Edel Mulholland

From: Edel Mulholland
Sent: Wednesday 11 February 2026 15:49
To: ACPreferrals
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - KCC Environment Department

Hi Catherine,

There is no problem with that timeline, thank you.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: ACPreferrals <acpreferrals@kildarecoco.ie>
Sent: Wednesday 11 February 2026 15:43
To: Edel Mulholland <emulholland@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - KCC Environment Department

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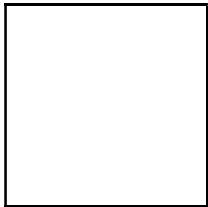
Hi Edel

Is there a hard deadline on this request? Kildare County Council would like to provide a response however due scheduling issues it would be the end of next week before we can get a response to you. Is this satisfactory?

The letter we received was dated 16/02 and that allows 4 weeks (11/02/26) however we will not get a response to you by end of day

Thanks and regards,
Catherine
Asst Staff Officer,

Planning Department,
Kildare County Council, Áras Chill Dara, Devoy Park, Naas, Co.Kildare.
W91 X77F
Contact: 045 980467: cehoward@kildarecoco.ie



Tá an ríomhphost seo príobháideach agus ní ceadmhach úsáid an ríomhphoist seo d'éinne ach don té ar seoladh chuige é. D'fhéadfadh go mbeadh eolas ann atá faoi phribhléid agus rúnda de réir an dlí. Munar duit an ríomhphost seo, déan teagmháil leis an seoltóir chomh luath agus is féidir. D'fhéadfadh nach iad tuairimí Chomhairle Contae Chill Dara na tuairimí atá curtha in iúl sa ríomhphost seo. Déanann Comhairle Contae Chill Dara iarracht ríomhphoist a chosaint ó víris. Mar sin féin, moltar duit gach ríomhphost a scanadh, mar ní ghlacann an Chomhairle aon dliteanas i leith damáiste do do chórais. Le haghaidh eolas ar do chearta príobháideachta agus ar conas a bhainistimid sonraí pearsanta, logáil isteach ar <https://kildarecoco.ie/YourCouncil/GovernanceandCompliance/DataProtection/> Chun do chuid sonraí pearsanta a nuashonrú cuir ríomhphost chugainn ag customercare@kildarecoco.ie Caithfidh tú deis a thógáil don Chomhairle cé thú féin a chinntiú trí cruthúnas céannachta agus/nó seoladh a sholáthar, sula ndéanaimid aon athruithe.

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Edel Mulholland

From: ray@lullymoreheritagepark.com
Sent: Wednesday 16 March 2022 16:11
To: Karen Mulryan
Subject: RE: Ref Letter 191136 g

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,
No worries and thanks for your email. As a social enterprise with community and environmental goals our primary concerns for the Ballydermot area in general are anything that negatively effects the future rehabilitation of the cutaways or the rich biodiversity present and our ability to promote the peatlands and attract tourism to the area. My next board meeting is in 3 weeks so we will do our best to reply in that time frame if our board decides to make an official comment.

Kind regards,

Ray.

Ray Stapleton,

Manager,

Lullymore Heritage & Discovery Park Ltd.

00353 45 870238

www.lullymoreheritagepark.com

-----Original Message-----

From: Karen Mulryan <kmulryan@mkoireland.ie>

Sent: Tuesday 15 March 2022 16:06

To: ray@lullymoreheritagepark.com; johnnyjudge37@gmail.com

Subject: FW: Ref Letter 191136 g

Importance: High

Hi Ray,

I am very sorry, your reply went to my spam so I didn't see it sooner. My spam deletes every 13 days so now I'm wondering if you replied to other emails I may have sent for other projects?

Apologies if you have, I didn't see your response.

We have another Bord na Mona site too with a substitute consent application.

I will forward details to you on that also.

An ideal timeframe for a response would be 4 weeks if possible?

Kind regards,

Karen.

Karen Mulryan

Environmental Scientist BA MSc ACIfA IAI

MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611
www.mkoireland.ie

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-----Original Message-----

From: ray@lullymoreheritagepark.com <ray@lullymoreheritagepark.com>
Sent: Saturday 26 February 2022 16:44
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: johnnyjudge37@gmail.com
Subject: Ref Letter 191136 g

You don't often get email from ray@lullymoreheritagepark.com. Learn why this is important
<<http://aka.ms/LearnAboutSenderIdentification>>

Hi Karen,

Thanks for your recent correspondence and the Environmental Impact Scoping document for the Ballydermot area. I will share with our board / management and get back to you with our comments. Can you give me a timeframe or deadline for comments to be returned.

Yours sincerely.

Ray.

Ray Stapleton,

Manager,

Lullymore Heritage & Discovery Park Ltd.

00353 45 870238

www.lullymoreheritagepark.com <<http://www.lullymoreheritagepark.com/>>

Edel Mulholland

From: INFO <Information@tii.ie>
Sent: Monday 28 February 2022 10:33
To: Karen Mulryan
Subject: RE: SPAM 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

Dear Ms. Mulryan,

I acknowledge receipt of your email relating to the above EIAR Scoping exercise.

TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

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

- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts,
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
- The EIAR/EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)),
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference

to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs,

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,
- TII recommends that the applicant/developer should clearly identify any haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I trust that the above comments are of use in your EIAR preparation.

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII22-117336



From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 21 February 2022 12:54
To: INFO <Information@tii.ie>
Subject: SPAM 191136g- rEIA Scoping for Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group, on the border of County Offaly and County Kildare

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Good afternoon,

On behalf of Bord na Móna Plc and subsidiaries ('the Applicant'), MKO is preparing a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a Substitute Consent Application for past peat extraction activities at the Ballydermot Bog Group. The Ballydermot Bog Group comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The total site area covers 5,581 hectares. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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

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

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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



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Edel Mulholland

From: INFO <Information@tii.ie>
Sent: Wednesday 11 February 2026 08:25
To: Edel Mulholland
Subject: TII26-134825 - Environmental Impact Assessment Report (rEIAR) Ballydermot, Co. Offaly and Co. Kildare. Your ref: 250709

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

Dear Ms. Mulholland,

Thank you for your correspondence of 15 January 2026 regarding the above. Transport Infrastructure Ireland's (TII) position in relation to your enquiry is as follows.

TII wishes to advise that it is not in a position to engage directly with planning applicants with respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official national road and light rail policy and guidelines including the Department of the Environment, Community and Local Government (DoECLG) Guidelines, 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012), and TII Publications.

Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

With respect to rEIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an rEIAR, which may affect the national roads.

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

- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the National Road Network, and junctions with national roads, in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.
- The developer, in preparing rEIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The developer, in preparing rEIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority (NRA), 2006).
- The rEIAR 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 (NRA, 2014)').

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the National Road Network and junctions of lower category roads with national roads. In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- TII recommends that the applicant/developer should clearly identify any haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I trust that the above comments are of use in your rEIAR preparation.

Yours sincerely,

Suzanne Cahill
Senior Regulatory & Administration Executive

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday 15 January 2026 14:27
To: INFO <Information@tii.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - TII

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Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
 Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91

VW84



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735

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Edel Mulholland

From: BCI Info <info@batconservationireland.org>
Sent: Thursday 22 January 2026 12:56
To: Edel Mulholland
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Bat Conservation Ireland

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Edel,

Thank you for your e-mail.

Unfortunately, as Bat Conservation Ireland is a very small organisation, with limited resources, we do not have the capacity to get involved in planning issues.

Please note that Bat Conservation Ireland is concerned that a request for our input/consultation/opinion/assistance on planning applications and reports, or objections/comments on same, can sometimes imply that we have been consulted for our opinion on planning matters when Bat Conservation Ireland does not, in fact, provide opinions or comments on developments. Therefore, please note that this response should not be construed as a consultation with Bat Conservation Ireland regarding any planning or development matter or proposal. In order to avoid misunderstandings, please do not use this terminology in your reports to describe this transaction.

Thank you for your understanding.

Yours sincerely

Dawn Quinn
Administrative Manager
Bat Conservation Ireland

Please note my workings days/hours as follows:

Monday 9am – 5.30pm | Thursday 9am – 5.30pm | Friday 9am – 12.45pm

Postal/Registered Address: Carmichael House, 4-7, North Brunswick Street, Dublin 7, D07 RHA8.

E-mail: admin@batconservationireland.org

Website: www.batconservationireland.org

Social Media: www.facebook.com/Bat-Conservation-Ireland | www.x.com/BatConservIre | www.instagram.com/batconservationireland/ | <https://ie.linkedin.com/company/bat-conservation-ireland>

Bat Conservation Ireland Online Training Platform - <https://training.batconservationireland.org/>



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Website: www.batconservationireland.org | Registered Address: Carmichael House, 4-7, North Brunswick Street, Dublin 7, D07 RH88.

From: Edel Mulholland <emulholland@mkoireland.ie>

Sent: Thursday 15 January 2026 14:54

To: BCI Info <info@batconservationireland.org>

Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>

Subject: 250709 - Ballydermot Substitute Consent rEIAR - Bat Conservation Ireland

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

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Edel Mulholland

From: BCI Jesmond Harding <conservation.butterfly@gmail.com>
Sent: Wednesday 28 January 2026 20:42
To: Edel Mulholland
Subject: Re: 250709 - Ballydermot Substitute Consent rEIAR - Butterfly Conservation Ireland
Attachments: Substitute Consent Letter Ballydermot.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Hello Edel.

Please find Butterfly Conservation Ireland's response to the documents provided in relation to substitute consent for peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare.

Please note that the word 'past' (peat extraction) is omitted because peat extraction continues on bogs in the Ballydermot Group. One example is referenced in the letter attached.

Yours sincerely,

Jesmond Harding
Conservation Officer
Butterfly Conservation Ireland

On Thu, Jan 15, 2026 at 10:50 AM Edel Mulholland <emulholland@mkoireland.ie> wrote:

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,

Edel.

Edel Mulholland

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84



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Butterfly Conservation Ireland
Butterfly House,
Pagestown,
Maynooth,
Co. Kildare.
Phone 01 610 6693
conservation.butterfly@gmail.com

January 28, 2026

Re: Bord na Móna Biomass Ltd Substitute Consent Application for Historical Peat Extraction at Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare

Dear Sir/Madam,

Butterfly Conservation Ireland notes Bord na Móna Biomass Ltd's intention to prepare a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) to accompany a substitute consent application for peat extraction and ancillary activities at Ballydermot within the Allen Bog Group, namely Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge Bogs (hereafter 'the Application Site').

The area comprises 5,581 hectares. This area consisted mainly of active raised bogs (habitat code 7110). This is a priority habitat under the Habitats Directive 1992. It is likely that the past extraction of material from the site would require an Environmental Impact Assessment Report.

Article 3 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 requires an Environmental Impact Assessment Report to set out the following:

1. The environmental impact assessment shall identify, describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors:

- (a) population and human health;
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in points (a) to (d).

2. The effects referred to in paragraph 1 on the factors set out therein shall include the expected effects deriving from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project concerned.

Annex I lists the projects requiring an EIAR under Article 4. One of these projects are:

19. Quarries and open-cast mining where the surface of the site exceeds 25 hectares, or peat extraction, where the surface of the site exceeds 150 hectares.¹

The Planning and Development and Foreshore (Amendment) Act 2022 requires the An Coimisiún Pleanála to consider both past and present EIA/AA requirements applicable to the development, extending the current obligation that only the EIR/AA positions at the time the development took place (which may be unclear) must be considered.²

The development referred to in your letter took place in different bogs in the region at different times over at least 30 years. It mostly ceased only in late 2020, but some smaller-scale extraction has continued since, such as west of the Crabtree River, Lullybeg.

After the Habitats Directive was agreed in 1992, Bord na Móna accelerated peat extraction, with milled peat production peaking in 2009 and remaining at over 3.5 million tonnes until 2016.³ Extraction of peat on 32 raised bogs designated as Special Areas of Conservation in 1999 only ceased in 2009.⁴

Given this legal context and the behaviour of Bord na Móna, it is possible that different EIARs are required for the bogs listed. The types of EIAR required might be subject to some dispute, given the extraction timescales across the bogs listed above.

The habitats lost and/or damaged include active raised bog (7110), Degraded raised bogs still capable of natural regeneration (7120), Depressions on peat substrates of the Rhynchosporium (7150), Bog woodland (91D0), Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (important orchid sites) (6210) (The Long Derries, Edenderry SAC Site Code: 000925) all listed under Directive 92/43/EEC.

Species protected under the Directive that have suffered loss or are likely to have suffered loss or extinction include Otter *Lutra lutra*, White-clawed Crayfish *Austropotamobius pallipes*, Black-headed Gull (colony destroyed in early 2000s), Curlew, Hen Harrier, Kingfisher, Merlin, Teal and Whooper Swan.

Damage caused by afforestation should also be considered.

To date, no Peatlands Enhanced Decommissioning, Rehabilitation and Restoration colloquially as the 'Peatlands Climate Action Scheme' (PCAS) has been applied to these bogs. This does not indicate a serious intention to repair the enormous damage sustained by the bogs, although it is not expected that the site has the potential to develop active raised bog (ARB) analogous to the priority EU Habitats Directive Annex I habitat within the foreseeable future (c.50 years). However, the presence of deep peat suggests that the bogs have the potential to develop Sphagnum-rich habitats in this timeframe.

Nevertheless, re-wetting across the entire bog, as part of the Scheme, will improve habitat conditions of the whole bog. Other peatland habitats will develop in a wider mosaic that reflects underlying conditions. Rehabilitating of former industrial peat production bog will also in the longer-term support other ecosystem services such as such the development of new habitat to support biodiversity and attenuation of water flows from the bog, improving water quality.

Re-wetting peat will initially maintain and enhance the carbon storage capacity of the bog. There is scientific consensus that restoration of hydrology in damaged bog can improve carbon storage, water

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02011L0092-20140515>

² <https://legalguide.ie/substitute-consent/#consideration-eia-aa>

³ <https://peatlands.org/assets/uploads/2019/06/Reilly-349.pdf>

⁴ <https://www.ipcc.ie/a-to-z-peatlands/irelands-peatland-conservation-action-plan/peatland-action-plan/over-exploitation-of-peatlands-for-peat/#:~:text=Bord%20na%20M%C3%B3na%20are%20the,designated%20and%20non%20designated%20peatland%20sites.>

storage and attenuation and help support biodiversity both on the site and in the catchment. This will reduce carbon emissions from the site from a larger carbon source to a smaller carbon source. In time, the site has the capacity to develop in part as a carbon sink. PCAS is expected to deliver significant contributions to Ireland's climate action. The ability of bogs to recover characteristic bog-forming mosses in under 10 years has been demonstrated by NPWS.⁵ The region has several annexed habitats and important species not listed in this response, but a list of important sites containing these was provided to Bord na Móna in 2023. More information that might be relevant can be found in our response dated 18 December 2025 to the Informal Scoping Reporting – EIA Scoping for the Proposed Wind Farm in the townland of Ballydermot and surrounding townlands on the border of County Kildare and County Offaly, prepared by MKO (your ref: 250708)

The bogs are very valuable sources of biodiversity. The diversity of peatland habitats, the range of peat depths, and the complexity of soil chemistry present in several areas contribute to a large plant diversity, with a correspondingly large invertebrate fauna. The area is a key site for biodiversity education, and is used by Butterfly Conservation Ireland, the Irish Peatland Conservation Council, Lullymore Heritage Park, BirdWatch Ireland, as well as by field study groups and individuals. The region is a remarkable resource for biodiversity, climate action, education and recreation, and habitats there must be sensitively restored and managed to continue to deliver these values.

Yours sincerely,

Jesmond Harding
Conservation Officer
Butterfly Conservation Ireland

Directors: Michael Jacob (Chair) Jesmond Harding, Kieran Buckley, Joseph Harding, Richella Duggan.

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⁵ https://www.raisedbogs.ie/wp-content/uploads/2022/12/0402_RBSB13_All_Saints_Bog_and_Esker_SAC_Restoration_Plan_A01.pdf

Edel Mulholland

From: Customer Service <customer.service@ccs.gov.ie>
Sent: Friday 16 January 2026 11:04
To: Edel Mulholland
Cc: Karen O'Neill; Robert Kennedy
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Department of Culture, Communications and Sport

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Dear Edel,

Thank you for contacting Customer Service in the Department of Culture, Communications and Sport.

Planning matters in general fall within the remit of the Department of Housing, Local Government and Heritage. Please note that following the coming into force of the Planning and Development, Heritage and Broadcasting (Amendment) Act 2021 (Act 11 of 2021) all Heritage functions previously held by the Department of Culture, Heritage and the Gaeltacht are now held by that Department. The Development Applications Unit may be contacted at Manager.DAU@housing.gov.ie.

Regards,
Ryan
Customer Service

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday 15 January 2026 11:03
To: Press Office CCS <Press.Office@ccs.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Department of Culture, Communications and Sport

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611



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Edel Mulholland

From: Defence Property Management Planning
<PropertyManagementPlanning@defence.ie>
Sent: Wednesday 11 February 2026 09:35
To: Edel Mulholland
Cc: Robert Kennedy; Defence Property Management Planning
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Department of Defence

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Dear Edel,

I would be grateful if all planning related correspondence could be directed to this email address only.

We will forward your scoping documents to our Defence Forces colleagues for their consideration. Once we receive a response from them, we will revert to you.

Kind Regards

Phil

Philomena Evans

Property Management Planning

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93

propertymanagementplanning@defence.ie

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Tuesday 10 February 2026 15:11
To: Defence Estate Management Curragh <Estatemanagementcurragh@defence.ie>
Cc: Defence Info <info@defence.ie>; Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Department of Defence

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Dear Sir or Madam,

Just following up on the below with regards to the Ballydermot Substitute Consent rEIAR scoping document. Please let me know if you need any additional information from my side.

Thank you, and I look forward to your response.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Edel Mulholland
Sent: Thursday 15 January 2026 10:59
To: 'estatemangementcurragh@defence.ie' <estatemangementcurragh@defence.ie>
Cc: info@defence.ie; Robert Kennedy <kennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Department of Defence

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

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Edel Mulholland

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Thursday 12 February 2026 10:55
To: Edel Mulholland
Subject: FW: 250709 - Ballydermot Substitute Consent rEIAR - Forest Service
Attachments: Ballydermot Subcon Scoping 2025 - F - 2026.01.15 - 250709.pdf; Scoping Doc Cover Letter 2025 - F - 2026.01.15 - 250709 - Forest Service.pdf; Ballydermot(Bord na Mona) Wind Farm Co Offaly Kildare.pdf

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Good morning

Please see comments/observations attached from our Felling Division

Regards

Environmental Co-ordination Unit

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday 15 January 2026 11:22
To: Forestry Info <forestryinfo@agriculture.gov.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Forest Service

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Dear Sir or Madam,

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphost seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.



MKO
Tuam Road
Galway
H91VW84

11th February 2026

Re: Bord na Móna Biomass Ltd Substitute Consent Application for Historical Peat Extraction at Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare.

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from the Department's website link here: [gov.ie - Tree Felling Licences \(www.gov.ie\)](http://gov.ie - Tree Felling Licences (www.gov.ie))

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; [gov.ie - Tree Felling Licences \(www.gov.ie\)](http://gov.ie - Tree Felling Licences (www.gov.ie)) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be



required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie - [Felling Licence Applications \(www.gov.ie\)](http://www.gov.ie)
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published on the Departments Forestry Licence Viewer (9FLV) link here: [Forestry Licence Viewer \(agriculture.gov.ie\)](http://agriculture.gov.ie)

It is important to note that when applying to a **Local Authority**, or **An Bord Pleanála**, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.



3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Neil O'Brien
Higher Executive Officer
Felling Section

Edel Mulholland

From: Lisa Mealiff <Lisa_Mealiff@hsa.ie>
Sent: Wednesday 28 January 2026 15:32
To: Edel Mulholland
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Health and Safety Authority
HSA:0342000000169

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Edel Mulholland
MKO
Tuam Road
Galway
H91 VW84

Our Ref: CAS-90436-L9P9 250709

28 January 2026

Re: - Ballydermot Substitute Consent rEIAR - Health and Safety Authority

Dear Edel,

I wish to acknowledge receipt of your correspondence dated 15 January 2026, regarding the above.

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Your correspondence appears to be outside the scope of the above and we have no comments to forward.

Yours sincerely
Lisa

Lisa Mealiff
Inspector
COMAH, Chemical Production & Storage
Chemicals & Industrial Products Division

Tel: 01-614 7007
Mobile: 087-360 4442

Email: lisa_mealiff@hsa.ie
Web: www.hsa.ie

Health and Safety Authority,
Block A, 2nd Floor,
Monksland Retail Business Park,
Athlone,
Co. Roscommon, N37 X8N1

An tÚdarás Sláinte agus
Sábháilteachta
Bloc A, An 2ú hUrlár, Páirc Ghnó
Mhiondíola Fhearann na Manach,
Baile Átha Luain,
Contae Ros Comáin, N37 X8N1



An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

Ár bhFís: Saolta agus fiontair shláintiúla, shábháilte agus tháirgiúla
Our Vision: Healthy, safe and productive lives and enterprises

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Edel Mulholland

From: Planning <planning@iaa.ie>
Sent: Friday 13 February 2026 11:35
To: Edel Mulholland; Planning
Cc: Christophe O'BRIEN; Karen O'Neill; Robert Kennedy
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Irish Aviation Ireland

Follow Up Flag: Follow up
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Dear Edel,
Thank you for your email and request for comment on the Ballydermot Substitute Consent rEIAR scoping document. Based on the information provided, the IAA has no comment or observations.

Kind regards,

Dave

From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Tuesday, February 10, 2026 3:35 PM
To: Planning <planning@iaa.ie>
Cc: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>; Karen O'Neill <koneill@mkoireland.ie>; Robert Kennedy <rkennedy@mkoireland.ie>
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Irish Aviation Ireland

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Dear Sir or Madam,

Just following up on the below with regards to the Ballydermot Substitute Consent rEIAR scoping document. Please let me know if you need any additional information from my side.

Thank you, and I look forward to your response.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Edel Mulholland
Sent: Thursday 15 January 2026 14:30
To: Planning <planning@iaa.ie>
Cc: 'obrienc@iaa.ie' <obrienc@iaa.ie>; Karen O'Neill <koneill@mkoireland.ie>; Robert Kennedy <rkennedy@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Irish Aviation Ireland

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

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mkoireland.ie | +353 (0)91 735 611



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Edel Mulholland

From: Irish Peatland Conservation Council <bogs@ipcc.ie>
Sent: Friday 30 January 2026 15:49
To: Edel Mulholland
Subject: Re: 250709 - Ballydermot Substitute Consent rEIAR - Irish Peatland Conservation Council
Attachments: SC_rEIAR_BnM_IPCC Ballydermot_30_1_2026.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Edel,

Please see attached comments from IPCC regarding substitute consent application for the historical destruction of peatland in Ballydermot.

Please confirm receipt for our records.

Kindest Regards

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

045 860133
bogs@ipcc.ie
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CHY6829

Registered Charity Number 20013547

Support the work of the Irish Peatland Conservation Council by joining as a Friend of the Bog or purchasing a gift from our online shop <https://www.ipcc.ie/nature-shop/>

On 15 Jan 2026, at 11:30, Edel Mulholland <emulholland@mkoireland.ie> wrote:

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

<image001.jpg>

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<Ballydermot Subcon Scoping 2025 - F - 2026.01.15 - 250709.pdf><Scoping Doc Cover Letter 2025 - F - 2026.01.15 - 250709 - Irish Peatland Conservation Council.pdf>



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, Ireland R51 V293

Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

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Edel Mulholland
Graduate Environmental Scientist
MKO
Tuam Road
Galway
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emulholland@mkoireland.ie

27th of January 2026

RE:Bord na Móna Biomass Ltd Substitute Consent Application for Historical Peat Extraction at Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare

Dear Ms Mulholland,

Thank you for including Irish Peatland Conservation Council as one of the consultees on the on this project. The Irish Peatland Conservation Council started the Save the Bogs Campaign 40 years ago to raise awareness of the disappearing peatland and the ecosystem services (flood regulation, biodiversity, tourism, carbon sequestration, natural and cultural heritage and amenity) being lost through habitat destruction and fragmentation. The peatland landscape of the midlands has been severely diminished through the industrial and domestic extraction of peat for energy and horticulture which has led to major consequences for the generations that have grown up without the opportunity of experiencing their natural heritage. In-fact Ireland is one of only two countries to officially announce a Climate and Biodiversity Emergency.

IPCC would like to make the following observations on this issue which I hope will provide some guidance for your application on behalf of Bord na Móna. IPCC have red line issues with regard to this assessment which are summarized in section 1 parts A-B below. Following this IPCC provide in [Section 2](#) accounts of specific issues and case studies relevant to this investigation.

Section 1 Red Line Issues

1A) Bord na Móna Mandate

From the very beginning in 1946 Bord na Móna were mandated to develop the peat bogs of Ireland and to provide an economy in the counties where their industry was located. It is true that the company have been successful in their endeavours, but the environmental cost has been high as the business of peat harvesting is not compatible with peatland conservation or valuing the ecosystem services that peatlands provide such as biodiversity, carbon storage and water regulation besides their use as a source of fuel and media for horticulture. In addition, a recent research article in Nature, has shown that Ireland has lost more wetlands in the past 200 years than any other country. 90% of Ireland's wetlands has been lost in this time through intensive drainage and industrial production. (<https://www.theguardian.com/environment/2023/feb/08/world-wetlands-europe-lost-study-aoe>).

IPCC would also like to highlight that Bord na Móna's mandate is now out of date and does not represent the aims of the public any longer. Since Bord na Móna ceased peat extraction and undertook the Peatlands and Climate Action Scheme, 33,000ha of peatland habitat has or is to receive enhanced rehabilitation and restoration setting the habitats on a trajectory of functional ecological and hydrological integrity. This land is meant to aid Ireland in reversing biodiversity, improve water quality and store carbon, while the company is still mandated to extract peat. The restored and rehabilitated peatland should now be managed by the National Parks and Wildlife Service or appropriate body to manage the sites for the ecology. With the passing of the Nature Restoration Law Ireland has to rethink how it manages public lands to ensure they provide for nature, water and climate. Please see "Pathways to a Sustainable, Resilient and Equitable Ireland: A Manifesto" by the Environmental Pillar (2024) for more information in this regard.

40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláráithe in Éirinn: 116156

Registered Office/Oifig Cláráithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Miriam Mooney, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar

Patrons: Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ni Lamhna, Matthijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland, Kathrine Geoghegan

Tina Claffey, Monty Don OBE.

1B) Unregulated Loss of Valuable Habitat

To lose 24% (almost 75,000ha) of the raised bog habitat of Ireland, the European headquarters for this habitat type, over the space of several decades is the evidence of the development spearheaded by Bord na Móna, without proper regulation as we have learned from your letter, and this needs to be fully taken into account and mitigated for in your assessment. It is only in the last 15 years that Bord na Móna have moderated their values somewhat and had begun to actively engage in their own Peatland Restoration Programmes, initially with the intention of managing up to 4000ha or more of their restorable raised bog resource for conservation (see [Section 2E](#) below) including the designation of two site complexes as Special Areas of Conservation and three other sites as Natural Heritage Areas. This comes at a time when raised bog habitats are facing extinction across the country and is a very small contribution to the loss of biodiversity which the commercial activities of Bord na Móna have caused. While Bord na Móna are now at the end of peat extraction and have begun the Peatlands Climate Action Scheme, we must not forget that the enhanced rehabilitation is only occurring because of the extra funding and not on all of the land holding, only 33,000ha. The rest of the areas only receive the standard rehabilitation and is not for the benefit of biodiversity or climate change regulation but for the stabilisation of the peat soils. It has been shown in reports such as the EPA's BOGLAND that these areas may not withstand the dryer summers and wetter winters predicted by climate change. They may return to being carbon emitters even with rehabilitation.

IPCC have found from bitter experience that commitments made by this company can easily be forgotten by those working on the ground (see Clonroosk Little Case Study) and therefore it is important that commitments made as part of the Bord na Móna Biodiversity Plan are recognised and upheld in your assessment. A

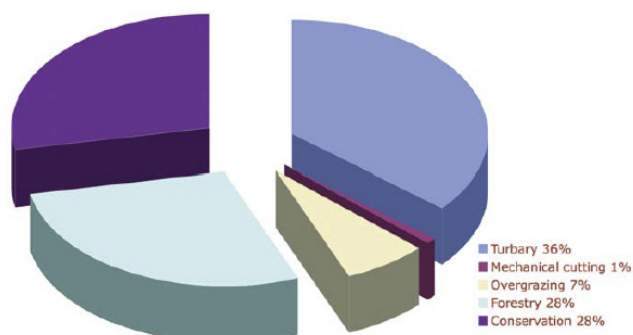


Figure 1: Utilisation of Blanket Bog habitat in the Republic of Ireland. The original area of blanket bog was 908,117ha according to Hammond 1979 and the pie chart is taken from Malone and O'Connell 2009.

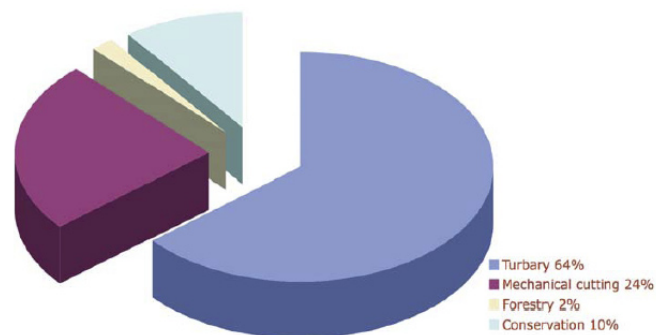


Figure 2: Utilisation of Raised Bog habitat in the Republic of Ireland. The original area of raised bog was 308,742ha according to Hammond 1979 and the pie chart is taken from Malone and O'Connell 2009. Although the pie chart indicates that 10% of the habitat is of conservation importance, only 1% of the habitat is actively forming peat.

Section 2 Specific Issues and Case Studies

2A - Loss of Peatland Habitat in Ireland Due to Commercial Peat Extraction

The pie charts attached in [Figures 1 and 2](#) show the utilisation of raised and blanket bog habitat in Ireland since these ecosystems reached their maximum development. 24% of the raised bog habitat and 1% of blanket bog habitats have been drained and developed by Bord na Móna. The speed with which Bord na Móna have developed the raised and blanket bog resources (from 1946 to the present) as part of a Government Mandate set against the lack of a strong peatland conservation and protection policy led to the formation of the Irish Peatland Conservation Council. Since our formation in 1982 we have been campaigning for a balanced and wise-use approach to the conservation and utilisation of peatland resources. The campaign work has been difficult and it is unfortunate, but today we are witnessing the almost total extinction of raised bog habitat. According to the Raised Bog SAC Management Plan (2017) only 3,600ha of raised bog habitats (1% of the original area) are actively producing peat and to maintain this function requires significant intervention and costly restoration. However the work is necessary in terms of biodiversity, carbon storage and sequestration, water regulation and community well-being.

2B - Peatland policy of the Irish Peatland Conservation Council

The Irish Peatland Conservation Council's mission is to conserve a representative sample of the peatlands of Ireland for people to enjoy now and in the future. We are an environmental NGO formed in 1982 in response to the rapid destruction of peatland habitat due to industrialisation. Our actions and policies are fully outlined in our sixth peatland action plan entitled Ireland's Peatland Conservation Action Plan 2020 – Halting the loss of biodiversity which can be read on line at www.ipcc.ie. In 2021 IPCC also published an amendment, The Peatlands and Climate Change Action Plan 2030 which guides our campaigns and actions and highlights the importance of peatlands as catalysts for climate change mitigation and regulation through the practical demonstration of measuring carbon within an IPCC nature reserve and synthesising recent scientific research and describing the legal landscape. The legal basis for the IPCC's work is a collective responsibility to avoid the deterioration of natural habitats and species protected under the Birds and Habitats Directives (as it has identified the rarest habitats and species in Europe). IPCC are a stakeholder on the Peatlands Council which was established by Government on the 7th April 2011. We have contributed to the development of the National Peatlands Strategy 2015, the Raised Bog SAC Management Plan 2017, a review of the use of peat in the horticulture industry (2020) and the Manual on Best Practice in relation to the restoration of raised bog habitats (2017). We also work with the peatland industry through our representation on the International Peatland Society and the National Branch of this organization - the Irish Peatland Society. We contributed to the development of the Strategy for Responsible Peatland Management (2010 and 2019) developed by this group for its members.

2C - Case Studies: Peatland Conservation and the Bord na Móna Peat Industry

2C.1 Pollagh Bog

The first direct conflict between conservation interests and Bord na Móna was raised by Prof John J. Moore S.J. in 1955 and concerned the proposed development of Pollagh Bog, Co. Offaly which was the only known location for the Rannoch Rush *Scheuchzeria palustris*. The plant was growing in an extensive and unique internal drainage soak feature of the bog. While Prof Moore made a case for the preservation of Pollagh Bog and this rare plant, his concerns were ignored and the bog was developed. Today it is the site of Lough Boora Parklands. An attempt to transfer the rush to Clara Bog soak failed.

2C.2 Clara Bog

Another conflict arose in the 1980's concerning Clara Bog, Co. Offaly. Over 400ha of this site was owned by Bord na Móna and the site was scheduled for development. While discussions were underway between nature conservation agencies and Bord na Móna, the machines were sent onto the Lough Roe soak side of the bog (Clara East) to install a network of drains. Subsequently the site was purchased from Bord na Móna by the National Parks and Wildlife Service. It was many years before drains were blocked and the soak natural drainage feature of the site has been irreparably damaged. This conflict brought the famous naturalist David Bellamy to Ireland who addressed public meetings on the dangers of losing this wonderful site and other peatland heritage.

2C.3 Cadamstown East and West (Derrinboy Bog)

Another site complex Cadamstown East and West also known as Derrinboy in Co. Offaly was surveyed by the National Parks and Wildlife Service in 1984 and found to be of scientific and conservation interest. This site was on the Bord na Móna agenda for development as an important moss peat/horticultural resource and it was subsequently developed in 1992 despite its scientific importance having been established 8 years previously (Foss and O'Connell 1996).

2C.4 Raised Bog 1990 Conservation Agreement

Another public conflict arose in 1990 from concern across Britain and Ireland about the use of moss peat in gardening. The gardening public were informed of the environmental impact and the destruction of raised bog habitat that the production of moss peat for gardening was having on wildlife, biodiversity, habitat and greenhouse gas emissions. This campaign run by the Peat Consortium (of which IPCC was a member together with other NGO's across the UK) had a significant impact on the sale of moss peat products produced by Bord na Móna in the UK. Bord na Móna could not prove that their horticultural product was coming from sites already in production when they owned a series of intact raised bogs that were designated for conservation (Areas of Scientific Interest) by the National Parks and Wildlife Service and which would very likely have been developed by this company. To save the value of their horticultural exports and to alleviate cash flow problems the company were experiencing at the time an agreement was reached between Bord na Móna, the National Parks and Wildlife Service and the European Union on the conservation of raised bogs in the ownership of Bord na Móna. The package involved the purchase from Bord na Móna of 2,518ha of lands in 20 sites across the country at a cost of £3.1M and their transfer to the National Parks and Wildlife Service. The EU provided 75% of the purchase cost of the sites under Habitats Directive financial instruments in place at the time (Foss and O'Connell 1996). The sites involved are presented in Table 1.

Site Name	County	Area(ha)
All Saints	OY	112
Bellanagare	RN	400
Camderry/Boggauns	G	89
Carrowbehly	RN	184
Carrowmagappal	G	200
Castlefrench	G	35
Clooncullaun	G	53
Cloonkieran	RN	35
Corbo	RN	222
Crosswood	WH	33
Curraghlehagh	G	160
Easkey/Gowlan	SO	500
Funshin	G	8
Keelogue/Lisnageeragh	G	179
Kilsallagh	G	12
Lough Lurgen	G	31
Moorfield	G	25
Moyclare	OY	76
Shankill West	G	120
Trien	RN	44
Total	20 Sites	2518ha

Table 1: Peatlands transferred to the National Parks and Wildlife Service by Bord na Móna under the 1990 conservation agreement for which Bord na Móna received £3.1 million.

2C.5 Cloonroosk Little and Mostrim Bog Ditching and Drainage



Figure 3: Cloonroosk Bog County Kildare and Offaly - raised bog of conservation interest and the only site in County Kildare for *Sphagnum pulchrum*.



Figure 4: Air photograph of Cloonroosk bog showing drainage undertaken over the winter of 2013-2014.



Figure 5: Surface view of Cloonroosk bog showing drain and the disruption to the bog surface through the spraying of material from the drain onto the living peat forming moss layer.

Between 2013 and 2018 three further sites were ditched and drained by Bord na Móna despite the company making commitments in the National Peatland Strategy (2015) concerning their intention not to open up any undrained bogs for peat production and their commitment as managers of significant tracts of peatlands on behalf of the Irish people to show leadership in responsible management, rehabilitation and restoration of peatlands. [Table 2](#) shows the sites drained and ditched by Bord na Móna and discovered and brought to light by the Irish Peatland Conservation Council, An Taisce and the National Parks and Wildlife Service. The Cloonroosk Little Site already had a draft Rehabilitation Plan lodged with the EPA as part of the IPPC licensing process (Licence Ref. 502 of 2013) and the site being intact was in discussion in a National Parks and Wildlife Service review of Raised Bog Habitat in the country. As the development here exceeded 30ha, planning permission should surely have been required. The images presented in [Figures 3, 4 and 5](#) show the damage done to this site. The ditching and drainage of Mostrim Bog carried out the first time in 2016 was discovered by An Taisce and was taken to court. The second time in 2018 the ditching was in contravention of the Wildlife Act which makes it illegal to remove habitat of nesting birds within the breeding season (1st March to 31st August). After discovery and publicity on all sites drain blocking was voluntarily undertaken by Bord na Móna as a mitigation for the damage to the natural hydrology of the raised bog sites and the damage to the peat forming species and habitats present within them and to birds of conservation concern including Curlew.

Table 2: Sites Ditched and Drained by Bord na Móna (and subcontractors) from 2013 to 2018.

These sites have since been restored following discovery and investigation.

Site Name, County	Area (ha)	Year of Damage	Notes
Cloonroosk Little Bog, OY	50	2013/2014	Only station for <i>Sphagnum pulchrum</i> in Kildare
Mostrim/Coolamber			
Cloonshannagh Bog, LD	41	2016	Breeding Curlew Site
Mostrim Bog, LD	11	2018	Breeding Curlew site

2D – Post Industrial Rehabilitation of Cutaway Bogs

While IPCC agree with the list of peat extraction activities you document in your letter we would also add that a key element of the extraction which you have omitted and which is a requirement of EPA license is the rehabilitation of sites following the removal of the commercially viable peat from the individual bog units. In the company's Biodiversity Action Plan 2016-2021, it states that 15% of their estate area has been rehabilitated or restored. The Peatland Climate Action Scheme has also been initiated and preliminary enhanced rehabilitation works have been completed on some bogs. This activity needs to be included in your assessment of Bord na Móna activities. In relation to rehabilitation, IPCC, take a strong interest as we are consulted by Bord na Móna on their draft Rehabilitation Plans developed under license for sites coming out of production. For example from 2018 to 2019 we have been consulted by the Bord on the rehabilitation plans for the following sites:

Edera Bog, Longford
 Newtown/Loughgore, Co. Galway
 Attymon and Clonkeen Bogs, Co. Galway
 Ballysorrell Bog, Co. Tipperary
 Littleton Bog Complex, Co. Tipperary

Since the announcement of PCAS IPCC has also contributed our comments on many of the enhanced rehabilitation plans.

Cavemount Bog, Clonad Bog, Derries Bog, Turraun Bog, Lodge Bog, Belmont Bog, Boora Bog, Castlegar Bog, Cloonif Bog, Derrycashel Bog, DerryColumb Bog, Esker Bog, Garrydub Bog, Kellysgrove Bog, Kilmacshane Bog, Mount Lucas Bog, Oughter Bog, Pollagh Bog, Umeras Bog, Blackwater Bog etc.

We made detailed submissions to all of these documents on the following issues:

- proposed protection and management of deep peat bog remnants remaining within the rehabilitation sites
- the need for landscaping and profiling of sites following industrial abandonment so that drain blocking can substantially rewet the remaining peat area to prevent emissions of greenhouse gases from bare dry peat (currently the maximum level of rewetting that Bord na Móna can achieve is <20% of a bog unit area with very little intervention). The Bord have been too reliant on natural recolonisation of Scrub Birch Woodland and Rushes to stabilise their peat.
- the need to practice targeted management for biodiversity re-establishing on these sites
- the need to provide capital from the company's profits to fund rehabilitation works
- the need to undertake monitoring of successes and failures

- the need to publish for peer review the rehabilitation methods being used on industrial cutaway bogs
- the issue of surrounding important restoration sites within PCAS with renewable energy developments or other developments
- Dissolved Organic Carbon, Ammonia and Greenhouse Gas Emissions, impact of Nitrogen deposition on rehabilitated and restored sites.

In light of the current review IPCC would like to see rehabilitation actions proposed for industrial sites being brought under planning control.

2E – Bord na Móna Raised Bog Restoration Programme

IPCC have also been engaging with the Bord na Móna Raised Bog Restoration Programme (2009 to the present) which involves management of a number of sites across the Bord na Móna estate for nature conservation (see [Figure 6](#) sourced from a talk given by Barry O’Loughlin 2018 for examples). The sites include two complexes earmarked for designation as Special Areas of Conservation and three other sites to be designated as Natural Heritage Areas. These sites were proposed for conservation following extensive baseline surveys by the company ecology team between 2009 and 2012. These sites although partially drained in the 1980’s were identified by the company as having high ecological and conservation value as well as significant restoration potential. Other sites ditched and drained by the Bord have also been included in the programme such as Mostrim Bog in Co. Longford. The target area for this programme is between 2000 and 4000ha (see [Figure 6](#)). This work is one strand of the company’s Biodiversity Action Plan 2016-2021. Such sites are generally regarded as surplus to peat production requirements and lie outside the active industrial peat production areas.

By 2018 1597ha of land has been restored and it is expected to add another 2317ha to that going forward as shown in this table. Please note some sites that have been restored are not presented in this table notably Clonroosk Little, Counties Kildare and Offaly.

Year of Restoration	Site Name	County	High Bog Area (ha)	Total Site Area (ha)
2009	Abbeyleix Bog	Laois	104	190
2011	Cuckoo Hill Bog	Roscommon	60	145
2012	Moyarwood Bog	Galway	171	197
2013	Ballydangan Bog	Roscommon	215	240
2014	Lenareagh Bog	Galway	90	112
2014	Paul’s Lough Bog	Galway	118	132
2014	Cloonshannagh Bog	Roscommon	36	36
2015	Mostrim Bog (Phase 1)	Longford	41	41
2015	Cranberry Lough Bog	Roscommon	76	98
2015	Knock Bog	Roscommon	129	187
2016	Bunahinly remnant	Westmeath	28	303
2016	Clera Island	Roscommon	157	179
2016	*Bracklin remnant	Westmeath	19	755*
2016	Clynan Bog (Phase 1)	Westmeath	10	10
2017	*Lough Bannow remnant	Longford	33	758*
2017	*Clongawny More remnant	Offaly	27	1021*
2017	*Daingean-Rathdrum remnant	Offaly	26	368*
2017	Coolnagun remnant	Westmeath	90	670
2018	Ballysorrel	Tipperary	167	196
	Total Area		1597	5728
	Total restored to date		1597	
started				
2016 +	Killeglan Bog cluster	Roscommon	334	440
	Mostrim Bog (Phase 2)**	Longford/Westmeath	358	398
	Clynan Bog (Phase 2)**	Longford/Westmeath	63	63
	Clonwhelan Bog	Longford/Westmeath	132	162
	Glenlough Bog**	Longford/Westmeath	262	329
	Knockahaw Bog	Tipperary/Kilkenny	312	372
	*Cornaveagh remnant	Roscommon	21	91
	*Glashaboun North remnant	Offaly	16	508
	Tirur-Derrymore Bog Cluster	Galway	245	445
	*Lismanny remnant	Galway	15	15
	Newtown-Loughgore	Galway	340	454
	Lisclogher West Bog	Westmeath	164	239
	Kellysgrove Bog	Galway	118	192
	Total Area		2317	3645
	Total (overall)		3914 ha	9436 ha *

Figure 6: Table of Sites Involved in the Bord na Móna Raised Bog Restoration Programme.

This information was sourced from O’Loughlin 2018 at <http://www.bordnamona.ie/wp-content/uploads/2018/05/Barry-oloughlin-Bog-restoration-and-curlew-Projects.pdf>.

Bord na Móna sites proposed for SAC Designation

Clonboley Complex (including Ballydangan Bog) Roscommon
Killeglan Bog Cluster Roscommon

Bord na Móna sites proposed for NHA Designation

Glenlough Bog Longford/Westmeath
Clonwhelan Bog Longford/Westmeath
Knockahaw Bog Tipperary/Kilkenny

The restoration works carried out by Bord na Móna has led to a strong consultancy business within the company who have been involved in blocking drains on conservation-worthy sites owned by the National Parks and Wildlife Service. The company won a contract in 2020 to the value of €5 million from the Department of Culture, Heritage and the Gaeltacht to carry out restoration works

on a selection of the country's network of raised bogs of conservation value (including SAC- and NHA-designated sites).

Scoping

As IPCC are based in Lullymore and manage nature reserves within the proposed project area we have also included our comments on the current scoping initiated as part of the proposed Ballydermot wind farm. Despite the industrial extraction and decimation of the peat landscape this area is still described as "Class 3" - "Sensitive to Renewable Energy Development" within the County Kildare Development Plan due to its uniqueness and potential. In fact, the County Development Plan and Biodiversity Action Plan have both recognised the people of the County's desire to reverse (as far as possible) the industrialisation and begin the creation of a Peatlands Park. This would shift the regions industrial tone to one of climate change mitigation, biodiversity and wetland habitats, which IPCC fully support.

Conclusion

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 Ballydermot and within the Allen Bog Group 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.

The IPCC remains concerned that:

Mandate vs. Reality: Bord na Móna's historical mandate for extraction is fundamentally at odds with modern requirements for nature restoration and the Nature Restoration Law.

Rehabilitation Standards: "Standard" rehabilitation is insufficient to mitigate the risk of these sites becoming permanent carbon emitters. Only "enhanced" rehabilitation, focused on functional ecological and hydrological integrity, offers a sustainable pathway.

Accountability: Historical lapses in site protection (as seen in the Clara Bog and Cloonroosk Little case studies) necessitate that any consent granted must be tethered to rigorous, transparent, and legally binding conservation commitments.

Thank you for reading through our concerns and please acknowledge receipt of this submission.



Your Sincerely,

Tristram Whyte - Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council

References

Ireland's Peatland Conservation Action Plan 2020, Malone S and O'Connell 2009, IPCC, Kildare. www.ipcc.ie.

Irish Peatland Conservation Plan 2000, Foss, P J and O'Connell, 1996 IPCC, Dublin

Peatlands and Climate Change Action Plan 2030, O'Connell, Madigan, Farrell, Whyte, IPCC, Kildare, www.ipcc.ie.

Irish Peatland Conservation Council submission on Peat in the horticultural industry review <http://www.ipcc.ie/wp/wpcontent/uploads/2017/08/IPCC-Peat-in-the-Horticultural-Industry-Review-2020.pdf>

<https://www.theguardian.com/environment/2023/feb/08/world-wetlands-europe-lost-study-aoe>

Pathways to a Sustainable, Resilient and Equitable Ireland: A Manifesto



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133
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Bord na Móna Powergen
Main Street
Newbridge
Co. Kildare

26th January 2026

RE: Proposed Ballydermot Windfarm, Co. Kildare, Constraints Scoping 2026

Dear Powergen/Ballydermot Windfarm Project Team,

The Bog of Allen was originally ~115,000ha and blanketed much of the east of the Republic. The study area for the proposed Ballydermot Wind Farm was once a large complex of raised bog and associated habitats within the Bog of Allen. Its decimation has had massive effects on the local indigenous wildlife and contributed to biodiversity decline nationally. The blatant disregard for the natural landscape through intensive extraction of peat for energy and horticulture has contributed to much of the biodiversity and ecological losses that Ireland now faces, made evident within the last National Parks & Wildlife Service (NPWS) report to the EU Commission "The Status of EU Protected Habitats and Species in Ireland 2025"^[1]. Raised Bog (active) and Degraded Raised Bog, which are already rare and specialised habitats within Europe, have an overall status of "Bad" in Ireland with their "Range" also "Bad" and unchanged since 2019. It is of utmost concern that the raised bog within the Lullymore Bog Complex, now that it is out of production, be fully restored and special attention given to help the return of displaced and lost species. IPCC are making comments on the proposed wind farm, with the aim of protecting important areas and improving the ecological integrity of peatland in Counties Kildare and Offaly, but which has wide ranging national implications in regards to biodiversity recovery.

Concerns

IPCC's concern lies with the protection of the numerous raised bog remnants and local biodiversity hotspots of the greater Lullymore Bog and surrounding area. Following is an inventory of sites which deserve rigorous protection from the construction and operation of a wind farm.

Lodge Bog Nature Reserve - Co. Kildare (see Map 1)

This is a raised bog nature reserve and is one of the very few last near intact examples of raised bog remnants within the entire Ballydermot Works Complex. It covers an area of 35ha and while it was drained, it was never brought in to production. IPCC manage this site with the financial and manual support of our members and volunteers, who IPCC represent. 200 dams have been built across the 5km of drains and the water levels are manually monitored year round using the 118 piezometers installed along transects. The aim is to reverse the effects of drainage and the impact of industrial peat extraction on the bog margins.

A boardwalk at the most northern edge of Lodge Bog allows for schools and tourists to enjoy the vistas of Lodge Bog while learning about peatland habitats and their importance to future generations. Tourists arrive daily during the summer season and IPCC facilitates the school visits. The presence of turbines would be another threat to the views in conjunction with dust and blasting from the Hill of Allen quarry and mechanical domestic peat harvesting in the surrounding cutovers.

As breeding Curlew are extremely rare in Ireland and are at risk of extinction, IPCC could not support the construction of a wind farm which may upset migratory routes or supporting habitat for these birds. The installation of large turbines may have unknown consequences on their behaviour and breeding success.

Other species of note on Lodge Bog is the Large Heath Butterfly, actively monitored by IPCC with the National Biodiversity Centre. This species is described as *Vulnerable* within the Irish Red Data List, attributed to the fact that the Large Heath is a peatland specialist and its range has become severely limited and fragmented.

Lodge Bog and the impacts from renewable energy has to be excluded from the proposed study area.

35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity No/Uimhir Carthanacht: CHY6829 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156 Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh

Directors/Stiúrthóirí: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail,

Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,

Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

Lullymore West Nature Reserve - Co. Kildare (see Map 1)

Lullymore West (4.5ha) is a species rich nature reserve consisting of calcareous and acid grassland, deciduous woodland and cutaway raised bog. The IPCC have owned and managed the site since 2005. The diversity of habitats within the small area adds to the importance of the site as well as the established population of Annex II Priority Species Marsh Fritillary Butterfly, which are monitored throughout the year. The site is actively managed with ongoing scrub removal, grazing trials, a weekly butterfly survey (24 species recorded). Freshwater invertebrate monitoring is also ongoing. Previous works have included drain blocking and tree removal. Volunteers are an important part of IPCC's site management work and Lullymore West provides a backdrop for community engagement. This nature reserve is open to the public and visited daily by locals and tourists (national and international) as a natural amenity. The specialised grassland habitats display rare orchids and the wetland refugia provides for many species of dragonfly and other invertebrates.

The presence of the Annex I Marsh Fritillary highlights the importance of this site - for monitoring and research, community engagement, biodiversity protection and international tourism. IPCC could not support the development of a wind farm which may affect the ecological integrity and future potential of Lullymore West.

Lullybeg Nature Reserve - Co Kildare (see Map 1)

Lullybeg is a 10ha Bord na Móna rehabilitated cutaway, managed since 2010 by Butterfly Conservation Ireland. It is listed in the Bord na Móna Biodiversity Action Plan 2016-2021. This is an important conservation location as it is home to a population of Marsh Fritillary, the only protected species of butterfly in Ireland. The rewards of the conservation management and scrub removal are evident as the already impressive list of flora and fauna recorded on site are ever increasing.

Close by to Lullybeg there is a raised bog remnant which needs to be included in the restoration works (N662022586). This could be supported by the species rich developing flooded cutaway (N6893825389) and calcareous grassland habitats (N6795523611), which, with ecological management and maintenance of access routes linking the areas would add to the diversity of the site.

Lullybeg is another important site within a network of nature reserves regarding the proposed study area that may suffer ecologically with the development and construction of a wind farm. This site needs to be excluded from renewable energy development and the associated impacts.

Lodge Bog Wetlands - Co. Kildare (see Map 1)

This is a Bord na Móna (~35ha) site that has come out of production. Rehabilitation has been underway since 2014/15. The site has been included in the Peatlands and Climate Action Scheme and is supporting habitat for Curlew and a nesting ground for Lapwing (Red Listed - The Birds of Conservation Concern in Ireland). The rehabilitating cutaway is developing as an important biodiversity hotspot with many wetland bird species returning to use the site and Bord na Móna have also conducted *Sphagnum* restoration trials for the potential use across other sites.

Lodge Bog Wetlands, since coming out of production is now supporting a population of breeding Lapwing and is showing promising returns of wintering wildfowl. The construction and presence of turbines may upset the future potential for biodiversity for this site and would also affect Lodge Bog (IPCC). This site should be excluded from the proposed study area.

Lullymore Wetlands - Co. Kildare (see Map 1)

This is a 100ha rehabilitated area in Bord na Móna ownership developing into fen habitat. A portion of the site is leased by the Lullymore Heritage & Discovery Park and has been developed as a wetland walk which supports a large amount of annual national and international tourists. There is a population of "Red" listed Lapwing using the area and Bord na Móna have liaised with BirdWatch Ireland Kildare in regards to the protection and management of the birds. In 2016 - in conjunction with UCD, a green-house gas monitoring station was installed to research the emissions from cutaway habitats near birch woodland. This site needs to be excluded from the proposed study area and it needs to be ensured that it suffers no impacts from the wind farm.

Ballysooghan North - Co. Kildare (see Map 1)

This raised bog is listed in The Bog of Allen Heritage Survey 2005 (Hurley, C. 2005)^[6] which described it as actively forming peat with 75% *Sphagnum* cover. IPCC were due to put this site forward to the NPWS for inclusion within the Natural Heritage Area Raised Bog Network Review as it had conservation value and deserved designation. The IPCC Sites Database records this site as once being the only site within Co. Kildare with *Sphagnum Pulchrum* present. Bord na Móna had also ear-marked this site for biodiversity - yet in 2014 it was discovered that the site had been ditched with drains 9m apart which striated the full length of the remnant. A complaint was made to the Local Authority, NPWS and the Environmental Protection Agency. Bord na Móna apologised for the mistake and accelerated rehabilitation by blocking the drains and bringing the site formally within the Biodiversity Action Plan 2016-2021.

The potential for this damaged but regenerating raised bog is high in regards to protecting the remaining remnants of the greater Lullymore Bog Complex. This site should be excluded from the proposed study area.

Aghameelick - Co. Offaly (see Map 1)

This is an eastern raised bog remnant of Clonsast Bog (which is now mostly industrial cutaway) which was described within the Bog of Allen Heritage Survey 2005 as having up to 95% *Sphagnum* cover and a good hummock - hollow topography. The 90ha site is of regional importance due to the rarity of raised bog in Leinster. The IPCC Sites Database lists the Irish Hare (Annex V E.U. Habitats and Species Directive) as utilising this site. This site may be affected by turbines installed within the proposed study area and needs to be screened hydrologically and ecologically. The species present within the proposed study area or Aghameelick Bog may use migratory routes between them and the presence or construction of turbines would disturb them.

The Long Derries SAC (Sitecode:000925) - Co. Offaly (see Map 1)

This 30.37ha stretch of low esker ridge mixed with loam and peat soils is designated under the E.U. Habitats Directive as it contains Orchid-rich Calcareous Grassland as a qualifying interest. Within the NPWS Site Synopsis the Nightjar (Annex I of the E.U. Birds Directive) is listed as breeding on site and the partridge, a Red-Listed bird in Ireland, is also present contributing to the high conservation importance of The Long Derries SAC. Satisfactory setback distance from any proposed turbine must be provided.

Mouds Bog SAC (Sitecode:002331) - Co. Kildare (see Map 1)

This raised bog Special Area of Conservation has been described by the NPWS as of regional and national importance due to the low amount of raised bog in Co. Kildare. There is an assemblage of flora that is indicative of raised bog habitat such as *Sphagnum spp.*, Heather, Bog Rosemary and Bog Asphodel. The bird wildlife increases the conservation value with Kestrel, Skylark, Meadow Pipit and Red Grouse being present, the latter two being “Red” listed on the Birds of Conservation in Concern in Ireland. This site is to avail of restoration measures in 2022, funded by the €5m announced for peatland restoration on non-Bord na Móna lands. Bord na Móna is to carry out the restoration works. This site needs satisfactory assurances that it will not be affected by development of renewable energy infrastructure and associated impacts on species and hydrology.

Pollardstown Fen SAC (Sitecode: 396) - Co. Kildare (see Map 1)

This is the largest spring-fed fen in Ireland and is internationally important due to the rare species present which depend on the unique habitat. Three Annex I Priority Habitats are listed for Pollardstown Fen - Alkaline Fen, Calcareous Fen with *Cladium mariscus* and Petrifying Springs with tufa formation. The fen is hydrologically dependent on the calcium rich waters rising primarily at the margins. There are a number of rare and protected species described in the IPCC Sites Database such as 3 species of Whorl Snail (the only site in Europe to support all three when the site was designated), Marsh Fritillary, Otter, Golden Plover, Marsh Harrier and Greenland White-Fronted Geese. Pollardstown Fen was also included in the “Dragonfly Ireland Project” and 12 species of Dragonflies were recorded. It was also discovered that this fen is the only known site within Co. Kildare to support the Blue-Tip dragonfly. The established boardwalk and walking route around the fen allows the local community and visitors to enjoy the specialised range of flora and fauna. This site needs adequate setback distances and the potential for detrimental hydrological effects from construction of any turbines within a sensible range needs to be examined closely.

Umeras Peatland Park (See Map 1)

Umeras Bog was in industrial peat production since the mid 1970s and when Bord na Móna announced the cessation of peat extraction the local community, under the Umeras Community Development CLG, developed the concept of Umeras Peatland Park. This site has also received enhanced rehabilitation and restoration under the Peatlands and Climate Action Scheme. This was included as the peat depths were still considered deep at 2.5m over much of the site. The bog is already important for biodiversity as reported in the “Umeras Bog Biodiversity Study Report 19-08-2022” which lists the habitats present and the species recorded during the commissioned surveys. Important to species to note are breeding Ringed Plover and Lapwing. Hen Harrier also utilise the site. As the bog stabilises after the rehabilitation works it will become even more imperative that renewable development does not hinder the recovery of carbon storage ability, water quality and biodiversity. Turbines could impact on the migration routes and nocturnal movements of birds and this needs to be investigated.

Bord na Móna Biodiversity Action Plan 2016-2021

Please see [Map 2](#) for sites listed within Bord na Móna’s Biodiversity Action Plan as already receiving restoration or rehabilitation works. These sites need to be protected from the proposed infrastructure and associated impacts.

Habitats of Importance

Much of the Ballydermot/Lullymore Complex has not been under production for a long time, before the cessation of peat extraction by Bord na Móna and have naturally regenerated. IPCC see that embryonic fen, wet and dry grasslands, raised bog and wet and dry heath habitats as having long term biodiversity value. These should be protected from any proposed development.

Wetland Surveys Ireland

Wetland Surveys Ireland, on behalf of Offaly and Kildare County Councils, have earmarked a number of wetland sites for an ecological survey:-Rathvilla Ponds (WMI_OF213, raised bog, cutover bog, fen), Ballykillen Cutover (WMI_OF208, cutover bog, bog woodland), Cloncert Kilcumber (WMI_OF212, cutover bog, fen), Ballydermot-Clonbrown (WMI_OF215, raised bog, cutover bog, fen), Cushaling South East Bog (WMI_OF74). These sites need to be ecologically surveyed the data recorded included within the respective County Wetland Survey. It is not possible to ascertain the possible detrimental affect that a wind energy development may have if a sites ecological importance has not been described.

Cushaling East Wet Heath (WMI_KE106, wet heath, cutover bog), Cushaling River Valley (WMI_KE217), Ballysooghan (WMI_OF48), Ballydermot (WMI_OF215), Rathmore Bog (WMI_KE51, raised bog, cutover bog), Ballyteige South Bog (WMI_KE102), Allenwood South Bog (WMI_KE100, raised bog), Clonavoe Bog (WMI_OF85, raised bog, cutover bog) and Clonreen Ballrath Cutover Complex (WMI_OF214) have been described as having moderate/high local conservation value or are nationally important. These sites need adequate setback distances so as not to disturb the ecological integrity of the habitats present.

R414

IPCC operates from the Bog of Allen Nature Centre where we educate schools groups and members of the public in peatland ecology and the importance of a natural environment. At the centre we use the wildlife gardens and peatland museum as educational tools. The only route for coaches and visitors to arrive at the nature centre or the local nature reserves (Lodge Bog & Lullymore West) is along

the R414, which is a small narrow road with peatland on both sides. Large vehicles have difficulty traversing the route and any large construction operation (transport of materials/cable laying) will cause problems. If this road is to be closed for any amount of time The Bog of Allen Nature Centre will not be able to operate and lose the main source of operational finance. Construction sites may also be an issue for IPCC if when we bring schools to the nature reserves we have to bring them through a building site. In previous wind farm applications this was highlighted by IPCC but never addressed.

Curlew Conservation

The indigenous Curlew population of Ireland has reduced in number by 96% (Lewis et al, 2019) and as such are listed “Red” within Birds of Conservation Concern in Ireland (NPWS, 2019). There is currently a national effort to bring this species back from the verge of extinction and BirdWatch Ireland Kildare, NPWS and IPCC have been working together to increase measures on Lodge Bog to improve nesting success.

Lodge Bog has provided refuge to 3 Curlew (*Numenius arquata*), consisting of a native breeding pair and a single individual. Curlew are monogamous and show high site fidelity and preference, always returning to their home breeding ground. Curlew are long term residents of Lodge Bog, first officially identified in a baseline faunal survey carried out in 2005 by Michael O’Meara (Hurley, 2005).

A study in 2012 sponsored by Kildare County Council found evidence of breeding and that the 3 Adults have a high preference for Lodge Bog North (Ó Corcora, 2012)^[2]. Since 2015 IPCC have formally monitored the arrival and behaviour of the Curlew when they return to Lodge Bog in March and stay until July.

In 2022 one of the Curlew utilising Lodge was ringed and electronically tagged and was recorded numerous times at 53.277531,-6.8979829 possibly foraging. Since then a development without planning permission has destroyed the foraging area and the County Kildare Planning Department refused an application for retention with the impact to the Curlew being a main component (Planning Ref 22/390). This loss of foraging habitat also needs to be taken into account when assessing the impacts of the proposed wind farm and infrastructure as this was evidently one of the last suitable foraging habitats for Curlew in the County and Country.

IPCC have not recorded any sightings of Curlew on Lodge Bog in 2025/2026 but are aware that the Curlew which was tagged/ringed in 2022 is still utilising the Lullymore area as it has been recorded in Ballytiegue (near Allenwood) and in the Cushaling (Offaly/Kildare) area with at least 9 other Curlew. The ringed Curlew seems to be overwintering in Ballytiegue but the breeding grounds are not known. This needs to be ascertained before any more disturbance or habitat loss which would affect these native, near extinct birds occurs.

County Kildare Development Plan

Sensitivity to Development

The County Kildare Development Plan 2023-2029 (Chapter 13.3.1 - Landscape, Recreation & Amenity) describes the Ballydermot/Lullymore Bog Complex as being within “Class 3 High Sensitivity” to wind energy development and within “Areas with reduced capacity to accommodate uses without significant effects on the appearance or character of the landscape having regard to prevalent sensitivity factors”. This strengthens the importance of this area and highlights that it is unique. It would be unacceptable to lose this uniqueness, in biodiversity and climate change mitigation terms for a short term renewable energy development where the affects can not be reversed.

Action BI A31

Chapter 12. Biodiversity and Green Infrastructure states that the County Council support the delineation of an “interconnected Bog of Allen Nature Reserve, Special Amenity Area or National Peatlands Park” and expresses interest in working with stakeholders such as other Local Authorities and Bord na Móna to make this a reality. The IPCC are fully supportive and work with the National Peatlands Park Group which successfully campaigned for this action to be included in the County Development Plan. The peatlands of North East Kildare represent a unique opportunity with the last remaining large scale land mass of potential continuous raised bog in Europe. An area of this scale, if given the opportunity will go a long way in reversing the biodiversity emergency. The proposal for a peatlands park aligns directly with the National Parks and Wildlife Service’s position that biodiversity recovery must occur at scale, across whole landscapes rather than in isolated sites. NPWS has repeatedly emphasised through its strategic planning and its role in the National Biodiversity Action Plan that reversing habitat decline requires large, coordinated restoration programmes capable of delivering ecosystem-level change. The Ballydermot/Lullymore Complex—one of the largest peatland complexes in the country—represents exactly the kind of landscape where this approach is both necessary and achievable. A Peatlands Park would provide the governance structure, cross-county coordination, and long-term management framework needed to deliver restoration at the scale NPWS identifies as essential, while also supporting climate action, biodiversity recovery, water quality and community engagement across Kildare. There is a draft feasibility study available for more information.

https://www.nationalpeatlandspark.com/_files/ugd/e8c0f5_31d00f6efcc54d029d1a4713110f7e56.pdf

County Kildare Renewable Energy

County Kildare’s wind energy target for 2030 is 107MW with 53MW already permitted. Timahoe Solar Farm is 108MW. IPCC question the necessity of the proposal for a renewable energy development in a Class 3 High Sensitivity area of the County when the targets are already met. There are other areas more suitable for renewable development. The Ballydermot/Lullymore Complex has many habitats which have naturally regenerated, been rehabilitated or as a part of Bord na Móna’s extractive licence, have to be rehabilitated now industrial extraction has finished.

Drainage

It is important to note that if a development requires ongoing hydrological management to maintain the infrastructure then the landscape would better be better suited providing refugia for biodiversity, long term carbon storage and freshwater quality management. The lifespan of a renewable energy project and the carbon offset does not compare to a peatland landscape which will sequester for millennia. Installing infrastructure which will permanently alter the hydrological landscape will not allow the species to return which have been displaced and made locally extinct from the already intensive historical industrial peat extraction. The Ballydermot/Lullymore Complex is one of the only landscapes left where large scale embryonic wetland habitats can be created, rehabilitated and restored, which already has nationally important species monitoring and management ongoing and has a community which has been looking forward to the tonal shift away from an industrial landscape to one which provides intrinsic biodiversity protection, improved water quality and climate change mitigation without the continual pressures of renewable energy. Ireland is conducting self-sabotage by installing infrastructure which is inhibiting the intrinsic rehabilitation of some of the rarest habitats in Europe.

Peat Depth

All deep peats including raised bog remnants should be protected from drainage and infrastructure. These are the areas where there will be a repository of the original flora, seed bank and micro-biome which may be necessary for successful natural and native recolonisation. A map of the peat depth needs to be provided.

Peatlands and Climate Action Scheme

IPCC question the compatibility of the Peatlands Climate Action Scheme and large renewable energy developments. The IPCC are very supportive PCAS as it utilises advanced restoration techniques to go beyond the basic legal requirements to stabilise emissions to air and water as per Bord na Móna's integrated pollution and prevention licence issued by the Environmental Protection Agency. If these advanced expensive techniques are utilised for carbon sequestration, biodiversity recovery and water quality improvements then what are the impacts of installing large renewable energy developments in close proximity to them. Will this impact the return of species like waders? The advanced techniques should be used across the whole of Bord na Móna's land-bank for real biodiversity and ecological re-instatement. The €108 million provided for this scheme and advanced restoration techniques came from the European Union Resilience and Recovery Facility and should not be used to promote commercial renewable energy developments.

Fragmentation

The new roads, hardstands and infrastructure will fragment the site further diminishing the potential for biodiversity recovery. There will be construction works and ongoing hydrological alterations to facilitate access ways and development which will all accumulate to degrade the potential for meaningful biodiversity recovery and long term carbon sequestration. The benefit of having a landscape of scale for biodiversity recovery is less edge effect. By increasing the fragmentation the edge effect is also being increased which is detrimental to habitat management and conservation. This detrimental to the national attempt at reversing the biodiversity emergency.

The Peatlands of County Kildare

County Kildare once held 24,317ha of peatlands but 88% has been lost or man modified (Peatlands and Climate Change Action Plan, IPCC, 2021). The IPCC question whether peatlands are adequately protected within or outside designated sites. Pollardstown Fen was world famous because it was the only site in Europe which supported 3 species of rare whorl snail. 2 of these can now be considered extinct from the area (NPWS, 2026). Marsh Fritillary can no longer be found at Ballynafagh Lake SAC (Jesmond Harding, Butterfly Conservation Ireland, Pers. Com, 2026). These losses highlight in-action. IPCC supported the Kildare County Council in refusing a planning application to open a new turbary area to relocate turf-cutters from a protected site as it could have had impacts to a designated site and extending peat extraction to a new site when the county was meant to be moving away from this activity. Installing renewable energy in a peatland landscape is still miss-representing the importance a peatland of this scale has in terms of biodiversity recovery, carbon storage and water quality.

Conclusion

The Irish Peatland Conservation Council recognises the essential role of renewable energy in Ireland's transition away from fossil fuels. Our concern is not with wind energy itself, but with ensuring that its development does not repeat the environmental mistakes of the past. The Ballydermot/Lullymore Bog Complex represents one of the last opportunities in Ireland and indeed in Europe to restore a functioning peatland landscape at meaningful scale. After decades of industrial extraction, the remaining fragments of raised bog, fen, wetland, grassland and cutaway habitats are finally beginning to recover. This recovery is fragile, hard-won, and irreplaceable.

A wind farm spanning these conservation areas risks undermining the very ecological potential that communities, NGOs, Bord na Móna, and state agencies have worked to rehabilitate. The construction of turbines, roads and associated infrastructure would introduce new fragmentation, hydrological disruption and disturbance to species already under severe national pressure, including Curlew, Lapwing, Marsh Fritillary and other peatland specialists. At a time when Ireland is striving to reverse biodiversity decline, it would be counterproductive to impose further pressures on one of the country's most important peatland landscapes, particularly when Kildare's renewable energy targets are already met through less sensitive developments.

There is now a unique opportunity to shift the region from an industrial past to a future defined by ecological restoration, climate resilience, community amenity and eco-tourism. The concept of a National Peatlands Park, supported in the County Development Plan and aligned with NPWS's landscape-scale restoration vision, offers a long-term, sustainable alternative that delivers climate action without sacrificing biodiversity. The Lullymore Bog Complex, with its mineral island and mosaic of regenerating peatland habitats, is ideally placed to become a flagship example of Ireland's commitment to nature recovery.

The IPCC is not opposed to sustainable energy development, but the size, location and design of any proposal must respect the environmental sensitivities of this landscape. Without meaningful engagement, genuine conservation gains, and careful avoidance of the most ecologically valuable areas, a wind farm here risks repeating the fragmentation that has already cost Ireland so much of its natural heritage. The remaining peatland remnants deserve protection, not additional pressure. With thoughtful planning, the region can instead become a model of biodiversity restoration, community benefit and climate-positive land use, an outcome far more enduring than the short-term footprint of a wind farm.

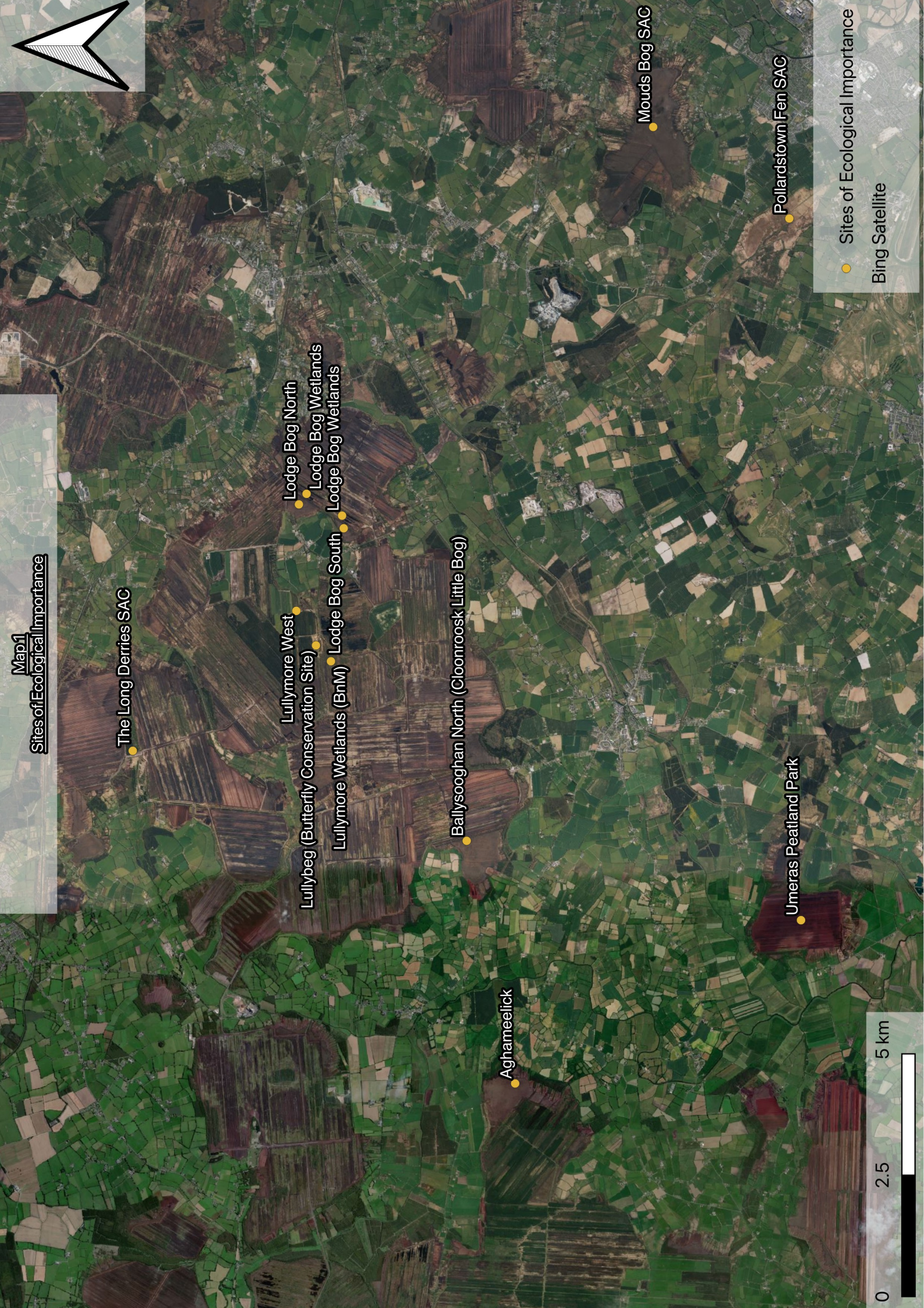
Your Sincerely,



Tristram Whyte - Freshwater Biology B.Sc(hons) - IPCC - Conservation Policy & Fundraising Officer

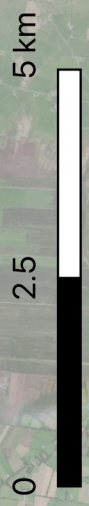
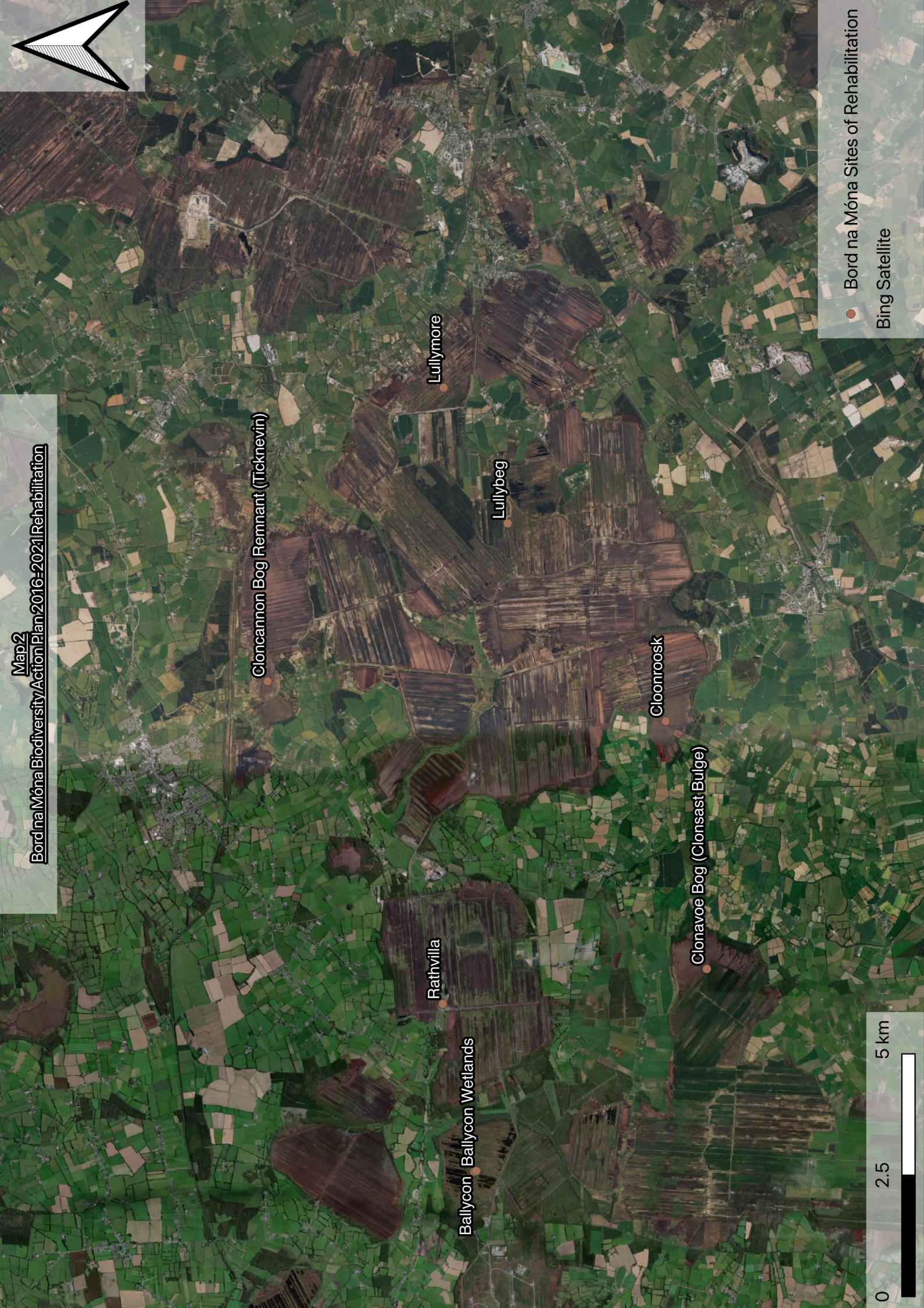
References:-

- [1] The Status of EU Protected Habitats and Species in Ireland 2025, National Parks & Wildlife Service, 2025.
- [2] Distribution and Breeding Success of Curlew on Lodge Bog, Co. Kildare, Irish Peatland Conservation Council, Tadhg Ó Corcora MSc, 2016.
- [3] Monitoring of three Annex II species of Vertigo snail on Irish sites (2022–2024), NPWS, National Parks & Wildlife Service 2026
- [4] Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10-2015/16, National Parks & Wildlife Service, 2019
- [5] Peatlands and Climate Change Action Plan 2030, O’Connell, C.A., Madigan, N., Whyte, T. & Farrell, P., 2021, Irish Peatland Conservation Council.
- [6] Ireland’s Peatland Conservation Action Plan 2020, Sarah Malone B.A.Heritage Studies, Dr Catherine O’Connell, The Irish Peatland Conservation Council, 2009.
- [7] Lodge Bog Management Plan 2005-2010, Irish Peatland Conservation Council, Caroline Hurley, 2005.
- [8] Checklist of Protected and Threatened Species in Ireland, National Parks & Wildlife Service, 2019.
- [9] The Bog of Allen Heritage Survey 2005, Irish Peatland Conservation Council, Caroline Hurley, 2005



Map 1
Sites of Ecological Importance

● Sites of Ecological Importance
Bing Satellite



● Bord na Móna Sites of Rehabilitation
Bing Satellite

Edel Mulholland

From: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Sent: Thursday 15 January 2026 14:19
To: Edel Mulholland
Cc: Robert Kennedy; Karen O'Neill
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Irish Rail

Follow Up Flag: Follow up
Flag Status: Flagged

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

Hi Edel,
This is remote from the Iarnród Éireann rail network and has no effect on it so we have no comments to make.

Regards,

Colin Hedderly

Senior Track & Structures Engineer, Iarnród Éireann/Irish Rail, CCE Dept,
Old Railway Station, Grace Road, Athlone, Co. Westmeath, N37 C573.

Mobile: 087 9681735 E-mail: colin.hedderly@irishrail.ie



From: Edel Mulholland <emulholland@mkoireland.ie>
Sent: Thursday 15 January 2026 14:03
To: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Cc: Robert Kennedy <rkennedy@mkoireland.ie>; Karen O'Neill <koneill@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Irish Rail

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

Dear Sir or Madam,

MKO has been appointed as Environmental and Planning Consultants to carry out a remedial Environmental Impact Assessment Report (rEIAR) and remedial Natura Impact Statement (rNIS) alongside a substitute consent application for past peat extraction activities at Ballydermot, Co. Offaly and Co. Kildare. Please see attached Scoping Document for further details.

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

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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Edel Mulholland

From: Emmett Hegarty(C) <emmett.hegarty@water.ie>
Sent: Tuesday 10 February 2026 14:13
To: Edel Mulholland
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Uisce Éireann ref: PN26000036142
Attachments: UÉ_PlanningResponse_PN26000036142.pdf

You don't often get email from emmett.hegarty@water.ie. [Learn why this is important](#)

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Good afternoon

Please find attached Uisce Éireann's scoping observations relating to the proposed Substitute Consent rEIAR for peat extraction works at Ballydermot, County Kildare. Uisce Éireann Ref: PN26000036142.

If there any issues or questions , please do not hesitate to let me know.

Emmett Hegarty
Development Management Planning

Uisce Éireann

Teach na hAbhann Duibhe, Mala, Co. Chorcaí, P51 K3CX

M +353 87 345 9798

emmett.hegarty@water.ie

www.water.ie

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truailithe, idircheaptha agus i leith leasuithe neamhúdraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

Uisce Éireann's Ref: PN26000036142

Planning Ref: 250709 - Ballydermot Substitute Consent rEIAR - Uisce Eireann

Planning Authority: Kildare County Council

Issue Date: 10 February 2026

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Uisce Éireann
PO Box 448
South City
Delivery Office
Cork City

www.water.ie

Development Location: Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare

Development Description: Re: Bord na Móna Biomass Ltd Substitute Consent Application for Historical Peat Extraction at Ballydermot within the Allen Bog Group, Co. Offaly and Co. Kildare

A Chara,

Thank you for your recent EIAR Scoping Request which we have reviewed. Uisce Éireann has the following comments for your consideration;

Uisce Éireann notes the presence of its Figile River Well abstraction point near the village of Clonbulloge, Kildare approximately 2 kilometers from the development area, furthermore the zone of contribution for this asset is more proximate, extending to a point approximately 500 meters from the developments westernmost boundary.

Please note that Uisce Éireann cannot permit any deleterious impact to its drinking water sources, as such it is requested that any future EIAR consider the potential for impact on this asset or any other surface water or groundwater abstraction points where a potential hydrological and hydrogeological pathway exists should also be considered. The EIAR must include and consider all direct, indirect and cumulative effects on the abstraction points.

In addition to the above, the following aspects of water & wastewater services should be addressed in the scope of an EIAR and planning proposals, ahead of submitting your planning application to avoid unnecessary delays.

- a) Protection of drinking water source(s) from potentially adverse impacts is a priority for Uisce Éireann. It is Uisce Éireann's current policy to maintain safe and secure drinking water supplies and ensure that development will not give rise to any deterioration in water quality. Development proposals shall not impact public drinking water sources and/or abstraction point(s). It is also a requirement of the

Water Framework Directive that waters used for the abstraction of drinking water are protected to avoid deterioration in quality. Where a development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction, operational and decommissioning phases of the development.

- b) Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of an EIAR and/or the planning application.
- c) Where the development proposes the backfilling of materials, the applicant is requested to include breakdown of the chemical components of the materials proposed.
- d) Where the development proposes the backfilling of materials, the applicant is requested to include details of best practice monitoring regime(s) to inform protection of ground waters, aquifers and drinking water source abstractions.
- e) Potential impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*) - If your proposals require a connection(s) to either a public water supply or sewage collection system, you are advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network ahead of lodging your planning application. The PCE should be submitted to Uisce Éireann well in advance of lodging your planning application. Lodging a COF with your planning application helps avoids delays in the consenting process.
- f) In relation to a development that would discharge trade effluent, any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- g) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to stop surface waters from combined sewers. Uisce Éireann does not permit surface waters into our sewer network.

- h) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- i) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- j) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- k) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- l) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- m) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- n) Uisce Éireann does not permit build over of its assets. Separation distances from public infrastructure, as per Uisce Éireann's Standards, Codes and Practices must be achieved. It is the applicant's responsibility to submit a diversion enquiry to Uisce Éireann Diversions Section (diversions@water.ie) prior to construction, where a potential build over of public assets is in question and/or where the

applicants proposals cannot achieve separation distances from public infrastructure as per UÉ Standards & Codes of Practice. As an applicant you are required to;

- survey the site to determine the exact location of the public assets. Any trial investigations should be carried out with the agreement and in the presence of Uisce Éireann. All queries relating to in situ public infrastructure should be directed to diversions@water.ie
 - Provide evidence of separation distances between the existing Uisce Éireann assets and proposed structures, other services, trees, etc. have to be in accordance with UÉ Standards & Codes of Practice
- o) Where an existing connection is in place, the applicant or developer may be required to enter into a new or revised water and/or wastewater connection agreement(s) with Uisce Éireann prior to the commencement of this development.
- p) Where new connection(s) are sought, the applicant shall enter into water and/or wastewater connection agreement(s) with Uisce Éireann prior to the commencement of this development.
- q) Any person discharging trade effluent** to a sewer, must have a Trade Effluent License issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). More information and an application form for a Trade Effluent License can be found at the following link: <https://www.water.ie/business/trade-effluent/about/> . Trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended).

Queries relating to the comments above should be directed to planning@water.ie

EIAR Scoping Requests should be sent to planning@water.ie

Yours sincerely,



Dermot Phelan
Connections and Developer Services

Edel Mulholland

From: Edel Mulholland
Sent: Tuesday 17 February 2026 09:26
To: Sandra Walsh
Cc: Karen O'Neill; Robert Kennedy
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Coillte

Hi Sandra,

As it relates to the Ballydermot Substitute Consent Application, there are no works proposed on Coillte lands. Bord na Mona are seeking Substitute Consent for peat extraction and all peat extraction ancillary activities from July 1988 to the present day (i.e. historic activities), that have been carried out at Ballydermot.

We are engaging with relevant stakeholders like Coillte to determine if there are any comments, concerns, or suggestions you may have in relation to the works that were conducted between July 1988 to the present day.

I am aware that you will have received a scoping request from our colleagues relating to the proposal for a wind farm at the same site, however that is subject to a separate application and scoping process.

With regard to your plans for biodiversity management, is there any further information you can share with us at this time?

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Sandra Walsh <Sandra.Walsh@coillte.ie>
Sent: Wednesday 11 February 2026 11:51
To: Edel Mulholland <emulholland@mkoireland.ie>
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Coillte

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Hi Edel,

What work is proposed to be carried out on the Coillte land as part of the project?

We recently mapped this area to be managed for biodiversity so if you wouldn't mind explaining further what will be expected from our side.

Kind regards,
Sandra

Sandra Walsh

Forest Ecologist | Coillte Forest | Coillte
21-25 Patrick Street, Fermoy, Co Cork, Ireland

E Sandra.Walsh@coillte.ie

M +353874847294

www.coillte.ie

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From: Edel Mulholland <emulholland@mkoireland.ie>

Sent: Tuesday 10 February 2026 15:40

To: Sandra Walsh <Sandra.Walsh@coillte.ie>

Cc: Karen O'Neill <koneill@mkoireland.ie>; Robert Kennedy <rkennedy@mkoireland.ie>

Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Coillte

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Hi Sandra,

Just following up on the below with regards to the Ballydermot Substitute Consent rEIAR scoping document. Please let me know if you need any additional information from my side.

Thank you, and I look forward to your response.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Edel Mulholland
Sent: Wednesday 28 January 2026 12:40
To: 'Sandra Walsh' <Sandra.Walsh@coillte.ie>
Cc: Karen O'Neill <koneill@mkoireland.ie>
Subject: RE: 250709 - Ballydermot Substitute Consent rEIAR - Coillte

Hi Sandra,

Could Coillte please review the document and provide comments or observations on the scope detailed therein.

Kind regards,
Edel.

Edel Mulholland
Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Sandra Walsh <Sandra.Walsh@coillte.ie>
Sent: Tuesday 27 January 2026 10:24
To: Edel Mulholland <emulholland@mkoireland.ie>
Subject: 250709 - Ballydermot Substitute Consent rEIAR - Coillte

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Hi Edel,

I refer to your recent email to Coillte with the above reference.

After reviewing the Scoping Document I would just like to ask what it is you are asking from us aside reviewing the document?

Kind regards,
Sandra

Sandra Walsh

Forest Ecologist | Coillte Forest | Coillte
21-25 Patrick Street, Fermoy, Co Cork, Ireland

E Sandra.Walsh@coillte.ie
M +353874847294

www.coillte.ie

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**TELECOMS SCOPING RESPONSES
FOR THE PROPOSED
BALLYDERMOT WIND FARM, CO.
KILDARE AND CO. OFFALY**

Ballydermot WF – Telecom Operator Consultations

1. 2RN Response to Consultations

From: Matthew Craig <matthew.craig@2rn.ie>
Sent: Tuesday 6 May 2025 12:05
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; windfarms@rte.ie; Johnny Evans <johnny.evans@2rn.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David and Kevin,

Our network has not changed in the area that you have highlighted.
We are only concerned about the impact to broadcast services from Kippure and would ask that a protocol be signed should the site go ahead. Something that I believe has already been done.

Regards

Matthew Craig

Project Engineer
Projects and Coverage Planning
2RN
Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland
D24 WK28
Mobile: + 353 (0) 87 7509955

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:45
To: Matthew Craig <matthew.craig@2rn.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; windfarms@rte.ie; Johnny Evans <johnny.evans@2rn.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Matthew,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.

If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

2. Airwave Response to Consultations

From: John Barry <john@airwave.ie>
Sent: Tuesday 6 May 2025 13:41
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Info @ Airwave <info@airwave.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

No infrastructure here

John Barry
Airwave Internet
e: john@airwave.ie
p: 021-2024000
m: 087-9471657

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:50
To: John Barry <john@airwave.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Info @ Airwave <info@airwave.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello John,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.

If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

3. CIE Response to Consultations

From: Peter Cunningham <Peter.Cunningham@cie.ie>
Sent: Friday 2 May 2025 09:53
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: FW: Ballydermot Wind Farm Development, Co Offaly

The proposed site lies within the GSM-R (Mobile Network for Railways) coordination zone. Please see below:

From a study carried out by the ANFR (Agence Nationale des Frequences in France), the output calls for 2 main recommendations by defining 2 main zones as follows:

- 1- **Exclusion zone:** wind farm not less than 5 Km from antenna
- 2- **Coordination zone:** : 5Km<wind farm <30Km: this area, coordination between operators is required to fix any issue and impact on the signal propagation



**Peter Cunningham,
Chartered Surveyor**

M: +353 (0)87 2112320,
Curzon House, 35 Lower Abbey St., Dublin 1, D01 H560
www.cie.ie

Driving Change for a Sustainable future

At Córas Iompair Éireann we believe in facilitating flexible working, so while it suits me to email now, I do not expect a response or action outside of your own working hours.

4. Coimisiún na Meán Response to Consultations

From: Roger Woods <rwoods@cnam.ie>
Sent: Friday 2 May 2025 09:04
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David

Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed sub station is not located close to any existing or planned FM transmission sites.

Regards

Roger
Innealtóir Feidhmiúcháin Sinsearach | Senior Executive Engineer

T: +353 (0)1 644 1200 | rwoods@cnam.ie



1 Áras Shíol Bhroinn, Bóthar Shíol Bhroinn, Baile Átha Cliath, D04 NP20, Éire.
1 Shelbourne Buildings, Shelbourne Road, Dublin, D04 NP20, Ireland.

Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda agus is leis an duine sin amháin a bhfuil siad seolta chuige/chuici a bhaineann siad. Muna duitse an ríomhphost seo, ní ceart é a léamh ná a scaoileadh chuig aon tríú páirtí. Iarrtar ort teachtaireacht a sheoladh chuig an seoltóir nó chuig info@cnam.ie, agus an ríomhphost seo a scrios.

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Déan machnamh ar an timpeallacht, le do thoil, roimh an ríomhphost seo a phriontáil.

Please consider the environment before printing this email.

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday 1 May 2025 16:53
To: Roger Woods <rwoods@cnam.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Reception CnaM <reception@cnam.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello Roger,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021. The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.

We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes

For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768

FAX : +353 65 6848769

Web : www.aibridges.ie

5. Department of Defence Response to Consultations

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>

Sent: Monday 19 May 2025 15:48

To: David McGrath <dmcgrath@aibridges.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>; Defence Property Management Planning <PropertyManagementPlanning@defence.ie>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Without Prejudice

Dear Mr. McGrath,

I refer to your e-mail below, dated 02 May 2025, in relation to the proposed windfarm development at Ballydermot, Co. Offaly.

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.

As a matter of practice, the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

Having consulted with the Military authorities, the Department of Defence wishes to make the following observations:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or if other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-

Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.

- In the event negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code. We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the pre-planning stage. Please contact me if you have any queries in this regard.

Kind regards,

Bernie

Bernie Tierney

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>

Sent: Friday 2 May 2025 12:09

To: David McGrath <dmcgrath@aibridges.ie>; Defence Property Management Planning <PropertyManagementPlanning@defence.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Dear Mr. McGrath,

The Department of Defence wishes to acknowledge receipt of your below email in relation to Ballydermot Wind Farm.

We will consult with our military colleagues and will revert in due course.

Please note that Don Watchorn and Sarah Zacharia no longer work in our Planning Unit.

Kind Regards

Phil

Philomena Evans

Estate Management

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

E-mail propertymanagementplanning@defence.ie

6. Eir Response to Consultations

From: Bagnall, John <john.bagnall@eir.ie>
Sent: Friday 2 May 2025 12:50
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: Re: Ballydermot Wind Farm Development, Co Offaly

Hi David,

No change still the 5 links traversing the area.

Eir fixed network

Link	Description	Link Type	Co-ordinates		Antenna Heights		Link Distance	Freq used in Calculations for Fresnel Zone
			Site A	Site B	Site A	Site B		
1	Dunmurry Hill - Castlejordan	PTP	53 11 55.12 N 06 56 00.84 W	53 23 49.63 N 07 07 06.54 W	37.5m	7m	25.3 km	11 GHz
2	Dunmurry Hill - Edenderry Garda Stn	PTP	53 11 55.12 N 06 56 00.84 W	53 20 11.42 N 07 03 38.24 W	37.5m	24m	17.5 km	11 GHz
3	Dunmurry Hill - Clonbullouge	PTP	53 11 55.12 N 06 56 00.84 W	53 15 43.41 N 07 05 09.36 W	37.5m	10m	12.4 km	11 GHz

Eir mobile network

Link	Description	Link Type	Co-ordinates		Antenna Heights		Link Distance	Freq used in Calculations for Fresnel Zone
			Site A	Site B	Site A	Site B		
1	Edenderry P.S. - Carbury	PTP	53 17 41.82 N 07 04 56.17 W	53 21 21.15 N 06 58 14.85 W	26.5m	12m	10.0 km	13 GHz
2	Edenderry P.S. - Togher	PTP	53 17 41.82 N 07 04 56.17 W	53 20 11.03 N 07 15 26.92 W	26m	23m	12.55 km	11 GHz

Kind regards,



John Bagnall
Wireless Transmission Engineer

M: +353 85 1053746
E: john.bagnall@eir.ie
Address: EirCode - D08 Y42N

From: David McGrath
Sent: Thursday 1 May 2025 17:10
To: John Bagnall <John.Bagnall@eir.ie>; MobileNetworksTXN@eir.ie
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello John,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

7. Enet Response to Consultations

From: Peter O`Brien <peter.obrien@enet.ie>
Sent: Friday 2 May 2025 09:16
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; John Byrne <John.Byrne@enet.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi,

We have one link passing through this area:

Link Name	A-End Coordinates	A-End Antenna Height	B-End Coordinates	B-End Antenna Height	Frequency	Buffer
RTE Kippure - SCP0087 - Lullymore Heritage Park	53.178050 -6.331566	20m	53.270739 -6.949947	12m	7GHz	50m

Regards,

Peter O`Brien | Licensed Link planner

A: Enet House, National Technology Park, Castletroy, Co Limerick, V946P52

M: [+353867744313](tel:+353867744313) | **W:** www.enet.ie



Registered in Ireland, Registration No. 332982

Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52

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From: David McGrath <dmcgrath@aibridges.ie>

Sent: Thursday, May 1, 2025 4:53 PM

To: Peter O`Brien <peter.obrien@enet.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>; John Byrne <john.byrne@enet.ie>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Peter,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.

The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.

We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

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UNIT 9, BLOCK B,
Quin Rd. Business Park,
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Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

8. ESB Networks Response to Consultations

From: wfanalysis (ESB Networks) <wfanalysis@esb.ie>
Sent: Thursday 28 August 2025 12:23
To: David McGrath <dmcgrath@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Good morning,

Please find attached a basic exclusion zone created for the development at Ballydermot Wind Farm. To avoid interference to our links, the development must fall outside of this zone.

Please note that this exclusion zone represents a conservative zone because we have no turbine parameters, and this could be reduced on provision of hub height and blade size and either turbine location or development boundary.

Any proposed wind turbines within the defined exclusion zone will require further detailed coordination to avoid interference and degradation of critical ESB-operated radio links.
We kindly request that you re-consult with ESB once the turbine locations and dimensions are available.

Kind regards,
Abud

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday 1 May 2025 17:10
To: wfanalysis (ESB Networks) <wfanalysis@esb.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Walsh, Jonathan (ESB Networks) <jonathan.walsh@esb.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

CAUTION:This message is from an EXTERNAL SENDER - be CAUTIOUS, Do NOT Click any links or Open any attachments if you were not expecting them.

Dear Sir / Madam,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021. The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021. We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Tuesday 5 January 2021 09:10
To: David McGrath <dmcgrath@aibridges.ie>; Kevin Hayes <khayes@aibridges.ie>
Cc: Wilson Dalikeni <wilson.daliken@esb.ie>; Paul McDonagh <paul.mcdonagh@esb.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David, Kevin,

Happy new year to you both.

Please find attached detailed report of the impact to the ESB's Operational Radio Networks. There are several point to point radio links passing through the proposed site including a trunk radio link, an access radio link and also 1 point to multipoint radio link.

Once the turbine locations have been determined, please let us know as soon as possible so we can carry out a detailed analysis of the potential impact.

Regards,

Myles

2.3.1 Point to Point Radio links

There are 3 radio links that are crossing or near the site boundary, 2 of which are likely to be impacted by the turbines, the third, Carbury Hillside to Turlough Hill is just for information but isn't expected to be impacted.

Link 1: Carbury to Kilcumber 110kV

Site A: Carbury Hillside / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 11465MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL / 53.289091 -7.092573 / TX 10975MHz

Link 2: Carbury to Ballyoskill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7526MHz

Site B: Ballyoskill Hillside 110kV / 36m AGL / 72m ASL / 52.835216 -7.295671 / TX 7624MHz

Link 3: Carbury to Turlough Hill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7470MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL / 53.029880 -6.411684 / TX 7624MHz

2.3.2 Point to Multipoint Radio links

There is 1 point to multipoint radio link that will be impacted by the planned development:

Link 1: Carbury to Cushaling 110kV

Site A: Carbury Hillside / 10m AGL / 117m ASL / 53.355842 -6.970762 / TX 458MHz

Site B: Cushaling 110kV / 8m AGL / 67m ASL / 53.289372, -7.084755 / TX 458MHz

9. Imagine Broadband Response to Consultations

From: Paul Brunel <Paul.Brunel@imaginegroup.ie>

Sent: Friday 2 May 2025 10:57

To: David McGrath <dmcgrath@aibridges.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>; Ronnie O'Neill <Ronnie.ONeill@imaginegroup.ie>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

Imagine are in the process of decommissioning all our microwave links. This process should be complete within 12 months.

We do not need to be informed of any new developments going forward.

Kind Regards,

Paul Brunel

Transmission Planner,



Network Deployment.

 www.imagine.ie
 086 388 1962
 Sandyford Business Centre |
Blackthorn Road | Sandyford
| D18AW89



Disclaimer: www.imagine.ie/email-disclaimer/

10. Tetra Ireland Response to Consultations

From: Tom Barry <tom.barry@motorolasolutions.com>

Sent: Friday 2 May 2025 07:59

To: David McGrath <dmcgrath@aibridges.ie>

Cc: Thomas Barry <Tom.Barry@tetraireland.ie>; Kevin Hayes <khayes@aibridges.ie>; Aidan Damer <Aidan.Damer@tetraireland.ie>

Subject: Re: Ballydermot Wind Farm Development, Co Offaly

David,

There have not been any changes to the network in the area. Can you please ensure that the development is reviewed by eir.

Regards,
Tom

On Thu, May 1, 2025 at 5:13 PM David McGrath <dmcgrath@aibridges.ie> wrote:

Hello Tom,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.

The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.

We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

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Quin Rd. Business Park,
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Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

11. Three Ireland Response to Consultations

From: David Montgomery <David.Montgomery@three.ie>
Sent: Tuesday 6 May 2025 12:16
To: David McGrath <dmcgrath@aibridges.ie>; DL Estates ROI <Estates@three.ie>; Monika Biniaszewska <Monika.Biniaszewska@three.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Sean Kelly <Sean.Kelly2@three.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

A few changes in this area since 2021. Latest transmission link details below.
Can you leave a 20m buffer from the blade tips please?

Link no.	Link Ref	Freq.	Site A	X	Y	Lat	Lon	Dish Height	Site B	X	Y	Lat	Lon	Dish Height
1	ML016076	18GHz	OF0003	261743	232851	53.3425	-7.07379	30m	KD0157	274628	227022	53.2885	-6.88175	29m
2	ML020859	26GHz	OF0003	261743	232851	53.3425	-7.07379	30m	OF0108	261317	224051	53.2635	-7.08189	26m
3	ML020331	26GHz	OF0108	261317	224051	53.2635	-7.08189	26m	KD0213	266770	220331	53.2294	-7.00096	29m
4	ML020522	18GHz	OF0003	261743	232851	53.3425	-7.07379	30m	OF0105	261243	227548	53.2949	-7.08232	30m

Regards,

Dave

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:51
To: DL Estates ROI <Estates@three.ie>; Monika Biniaszewska <Monika.Biniaszewska@three.ie>; David Montgomery <David.Montgomery@three.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>; Sean Kelly <Sean.Kelly2@three.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

CAUTION! External Email.

Hello Monika, David,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.

If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
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Ennis, Co. Clare,
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Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

12. Uisce Éireann Response to Consultations

From: Peter Thornton <pethornt@water.ie>
Sent: Wednesday 7 May 2025 10:50
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

I can confirm that there are no UÉ communication links traversing the proposed wind farm.
Regards,

Peter Thornton
Telemetry Services Manager

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:51
To: Peter Thornton <pethornt@water.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; John Flaherty <jflaherty@water.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Peter,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.

If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

13. Viatel Response to Consultations

From: Marcin Skupski <Marcin.Skupski@viatel.com>
Sent: Friday 2 May 2025 09:27
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Conor Pendlebury <Conor.Pendlebury@viatel.com>; Viatel Customer Care <care@viatel.com>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

No impact.

Thank you,

Marcin Skupski

Build & Maintenance Team Leader

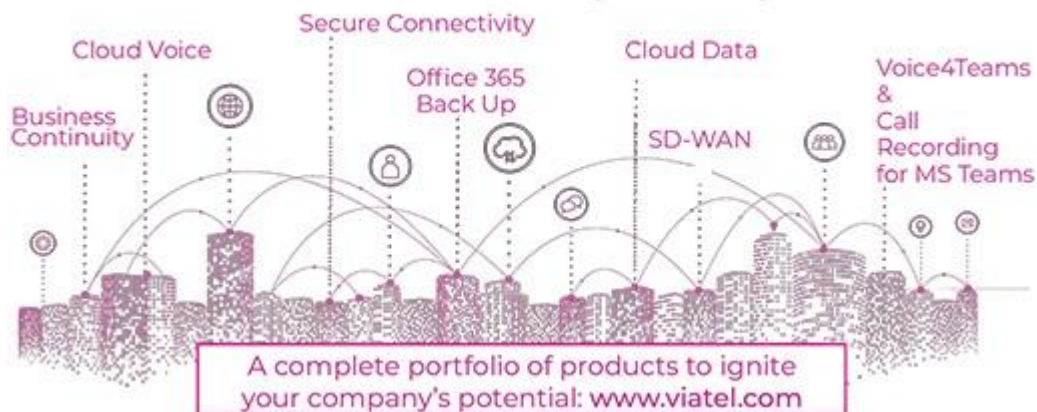
M: +353 (0) 86 8320724

E: Marcin.Skupski@viatel.com



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14. Virgin Media Response to Consultations

From: Keiran Butler <Keiran.Butler@virginmedia.ie>

Sent: Tuesday 13 May 2025 12:58

To: David McGrath <dmcgrath@aibridges.ie>; Mark Nolan <Mark.Nolan@virginmedia.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi All

Please see attached

This is a very busy site with Virgin Media as we have a lot of radio links here

Regards

Keiran Butler

Link Name / ID	Band MHz/GHz	Link Length	Site A					Site B				
			Lat	Long	Easting	Northing	Ant Height	Lat	Long	Easting	Northing	Ant Height
RochfortBridge Convent 20439I to VM Dunmurry	11GHz	34.5km	53° 24.907'N	7° 18.216'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Gaelscoil Eadan Doire 20332N to VM Dunmurry	13GHz	18.2km	53° 20.340'N	7° 4.292'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Oaklands Community College 72540O to VM Dunmurry	15GHz	17.7km	53° 20.229'N	7° 3.763'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Saint Marys Secondary School 65582Q to VM Dunmurry	13GHz	17.8km	53° 20.380'N	7° 3.592'W			8mts	53° 11.906'N	6° 56.003'W			8mts
ST_Etchens_NS_19848S to VM Dunmurry	11GHz	30.9km	53° 27.396'N	7° 6.171'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Cloch_Rinnce_NS_18093J to VM Dunmurry	13GHz	22.9km	53° 23.865'N	7° 0.902'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Johnstown_Est_Hotel to VM Dunmurry	13GHz	23.9km	53° 24.299'N	6° 50.206'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Irish Explosives to VM Dunmurry	13GHz	21.3km	53° 22.497'N	6° 48.608'W			8mts	53° 11.906'N	6° 56.003'W			8mts

15. Vodafone Response to Consultations

From: Robert Power, Vodafone (External) <robert.power1@vodafone.com>

Sent: Friday 2 May 2025 10:04

To: David McGrath <dmcgrath@aibridges.ie>

Cc: Kevin Hayes <khayes@aibridges.ie>; Chris Stephenson, Vodafone (External) <chris.stephenson2@vodafone.com>; Gavin Byrne, Vodafone <gavin.byrne@vodafone.com>; Sean Lyons, Vodafone (External) <sean.lyons@vodafone.com>; Siobhan Burke, Vodafone <siobhan.burke1@vodafone.com>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

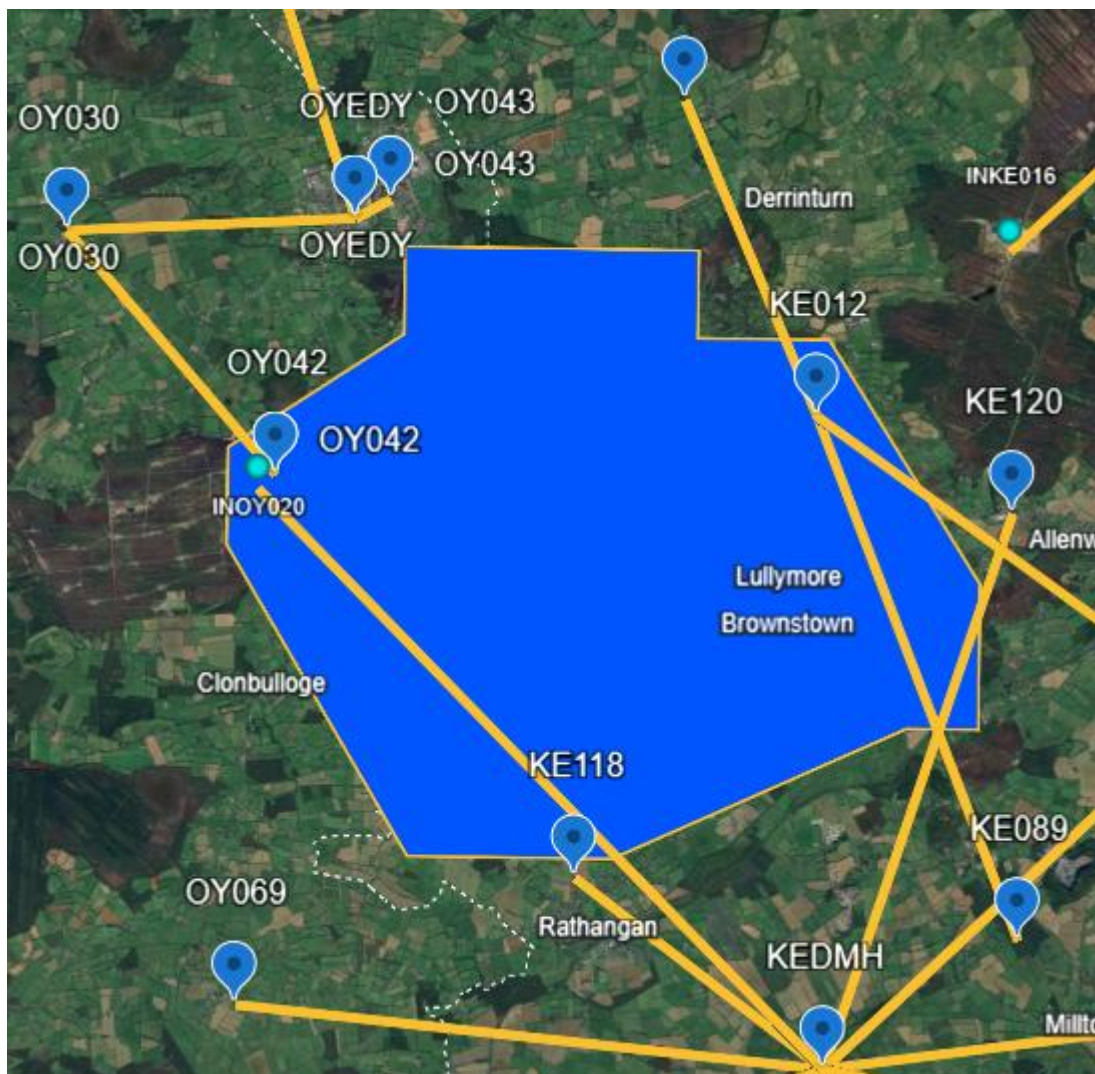
Hi Kevin,

All links highlighted previously are still active but I there are two more that I don't think were included last time. See table below.

Let me know if you require any additional information.

Kind Regards,
Robert

Link Name / ID	Band GHz	Link Length Km	Site A			Site B		
			Northing (Irish Grid)	Easting (Irish Grid)	Ant Height m	Northing (Irish Grid)	Easting (Irish Grid)	Ant Height m
KE012-KE013	18	8.894	228736	271054	15	223632	278338	15
KEDMH-OY020	15	14.604	216953	271317	30	227267.52	260978.39	30
KE120-KEDMH	18	10.603	227025	274631	25	216953	271317	35
KE089-KE012	18	10.169	219294	274833	24	228736	271054	20
KE012-KE114	26	6.2	228736	271054	22	234421	268578	7
OY030-OY042	26	5.839	231903	257364	31	227541	261246	52.87



From: David McGrath <dmcgrath@aibridges.ie>

Sent: Thursday 1 May 2025 17:16

To: Robert Power, Vodafone (External) <robert.power1@vodafone.com>

Cc: Kevin Hayes <khayes@aibridges.ie>; Chris Stephenson, Vodafone (External) <chris.stephenson2@vodafone.com>; Gavin Byrne, Vodafone <gavin.byrne@vodafone.com>; Sean Lyons, Vodafone (External) <sean.lyons@vodafone.com>; Siobhan Burke, Vodafone <siobhan.burke1@vodafone.com>

Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Dear Sir / Madam,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021. The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.

We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

Kevin Hayes

For and on behalf of **Ai Bridges Limited**

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Ennis, Co. Clare,
Ireland.

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