

1 INTRODUCTION

1.1 Background

Bord na Móna are the owners of a site located in An Srath Mór (Srahmore), and Áit an Bhaile (Attavally), Iorras-Baingear (Bangor-Erris), I gContae Maigh Eo (County Mayo) (the 'Srahmore Peat Deposition Site').

The development of the Srahmore Peat Deposition site, together with ancillary reception and administration facilities, previously formed part of a Planning Application to Mayo County Council associated with the development of the Bellanaboy Bridge Gas Terminal. Planning permission for these facilities was granted by Mayo County Council in April 2004 (Ref. P03/3343) and An Bord Pleanála in October 2004 (Ref. PL16.207212).

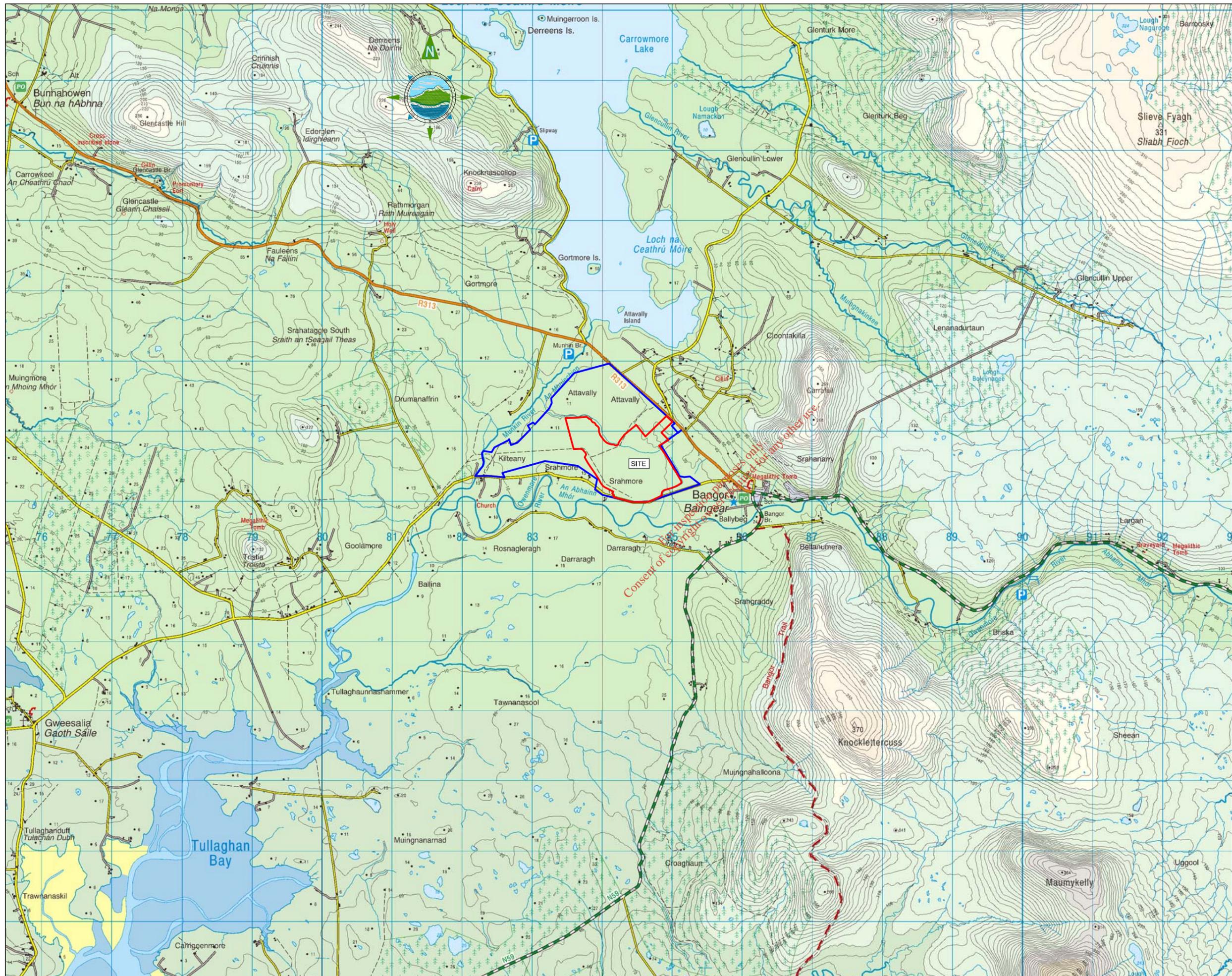
The Srahmore Peat Deposition site was, and continues to be, operated, managed and controlled in accordance with the requirements of the planning permission and its current waste licence issued by An Bord Pleanála in October 2004 (Ref.: PL16.207212) and the Environmental Protection Agency (EPA) in October 2004 (Licence Ref: W0199-01). (Refer to Appendix 1.1, Book 3 for Existing Permission and Waste Licence).

The location of the Srahmore Peat Deposition site in relation to the surrounding region is shown on Figure 1.1.

During the construction of the Shell EOP Ireland Ltd Bellanaboy Bridge Terminal Site, approximately 448,000m³ peat was excavated, then transported and deposited within the Srahmore Peat Deposition Site during 2005 and 2007. This peat was transported by public road from the Terminal Site in sealed vehicles to the Srahmore Peat Deposition site and deposited in a controlled and co-ordinated manner, in accordance with the requirements of both the planning permission and the waste licence; and in a manner to enhance drainage, stabilise the peat and allow for natural revegetation. The peat was transported to the Srahmore Peat Deposition site by an approved contractor. All operations within Srahmore were managed and undertaken by Bord na Móna.

As part of the overall proposed Corrib Onshore Pipeline development, approval is now sought under the *Planning and Development (Strategic Infrastructure) Act, 2006*, for the acceptance and deposition of up to 75,000m³ of peat within the existing activity boundary of the Srahmore Peat Deposition site, which is to be sourced from the proposed route of the On-Shore Corrib Gas Pipeline (referred to as the on-shore pipeline development).

The on-shore pipeline development will link the Off-shore Pipeline to the Bellanaboy Bridge Gas Terminal Site. The construction of on-shore pipeline will necessitate the removal and permanent storage of up to 75,000m³ of peat material from along the pipeline route.



GENERAL LEGEND

LANDS UNDER CONTROL OF DEVELOPER —

SITE ACTIVITY BOUNDARY —

NOTES

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE
3. ENGINEER TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES
4. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

5. OS DISCOVERY SHEET NO: F-0832

1km 0 1km 2km 3km

Rev	Date	Description	By	Chkd
E	01-02-09	ISSUED FOR RE-SUBMISSION	VB	MC
D	10-11-08	ISSUED FOR SUBMISSION	VB	MC

Applicant: Shell E&P Ireland Limited
Corrib House, 52 Leeson Street Lower,
Dublin 2, Republic of Ireland.

Operator: **BORD NA MÓNA**

Project: CORRIB ONSHORE PIPELINE DEVELOPMENT

Aspect: SRAHMORE PEAT DEPOSITION SITE

Title: REGIONAL SITE LOCATION MAP

Scale @ A1: 1:50,000 @ A3

Prepared by: V. Bonney Checked: M. Nolan Date: Feb 2009

Project Director: S. Finlay

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Drawing No.: **Figure 1.1** Revision: **E**

This Volume 3 of the Environmental Impact Statement (EIS), details the environmental characteristics of the previously permitted Srahmore Peat Deposition site and the potential impact resulting from the planned deposition of up to 75,000m³ of peat. Mitigation measures are outlined to ameliorate impacts where possible. An assessment of the residual impacts of the development is also outlined. This Volume of the EIS for the transport and deposition of surplus peat at Srahmore, together with Volume 1 & 2, completes the EIS prepared in respect of the proposed on-shore pipeline development.

Bord na Móna and the Oweninny Peatlands

Bord na Móna, the owner of the Srahmore Peat Deposition Site, currently owns 80,000 hectares (ha) of peatland, employs approximately 2,000 people and operates out of 30 locations, mainly in Ireland, but also in the United Kingdom and the United States.

The company has strong skills in resource management and development, manufacturing, distribution, science, engineering and human resource development. Bord na Móna has a wide range of services, products and operations:

- it supplies peat as a fuel for the generation of electricity;
- it generates electricity;
- it produces a range of peat-based fuels;
- sells coal and oil for residential and industrial heating;
- it markets horticultural products for commercial horticulturists and home gardeners;
- it sells pollution abatement products;
- it provides environmental consultancy and commercial laboratory services to industry and public authorities; and
- it provides integrated waste management services, including collection, processing, recycling and landfilling in the Midlands and East Leinster areas.

Its operations are divided into four constituent companies, limited in liability, and they are:

- Bord na Móna Energy Limited;
- Bord na Móna Horticulture Limited;
- Bord na Móna Fuels Limited; and
- Bord na Móna Environmental Limited.

Bord na Móna Energy Limited provided fuel in the form of milled peat from the Oweninny Works to the ESB's peat-burning electricity generating station at Béal Átha Liag (Bellacorick), I gContae Maigh Eo (Co Mayo). This power station was closed at the end of 2004 and peat harvesting from the Oweninny Works also ceased.

Bord na Móna submitted a rehabilitation plan for the cutover peatlands of the Oweninny Works to the EPA in January 2002. This rehabilitation plan, under IPPC Licence No. 505, was a generic plan that outlined the criteria defining successful rehabilitation at the Oweninny Works (to include both the Bellacorick) and Bangor peat extraction sites) and

described a number of test programmes that incorporated the principles and methods of rehabilitation. The EPA approved the rehabilitation plan in June 2002 (IPPC License No. 505). The condition that refers to cutover peatland rehabilitation within the IPPC Licence (505) is Condition 10 (Appendix 1.2, Book 3).

The Srahmore Peat Deposition Site forms part of the overall Bord na Móna Oweninny Peatland Works. A separate rehabilitation plan was submitted for the Srahmore Peat Deposition Site with the Waste Licence Application and the Planning Application in 2003. This rehabilitation plan was accepted by both An Bord Pleanála and the EPA in their respective planning permission (Ref.: PL16.207212) and waste licence (Ref.: W0199-01) issue. The rehabilitation included for the deposition of peat within the Srahmore Peat Deposition site (Area 6).

1.2 Waste Licence, Planning and Environmental Impact Assessment

Waste licence

Appendix A: Glossary of Terms of the National Waste Database Report (1998), published by the EPA, defines 'waste' as: *"any substance or object belonging to a category of waste, specified in the First Schedule or included in the European Waste Catalogue (EWC), which the holder discards or intends or is required to discard and anything which is discarded or otherwise dealt with as if it were waste shall be presumed to be waste until the contrary is proved."*

It is estimated that there will be up to 75,000m³ of excess peat arising from the construction of the on-shore pipeline development (addressed in Volume 1 & 2 of the EIS) that will require excavation and removal from the pipeline development. In this context the peat is considered a 'waste' as defined above.

Environmental Impact Assessment (EIA)

An EIA is a process that examines the environmental consequences of development actions, in advance. The emphasis is on prevention with the resulting information taken into account by the appropriate planning authority when forming their judgements on whether the development should go ahead.

In the case of significant impacts being identified, appropriate recommendations for the prevention and/or mitigation measures are highlighted. Where it is found that an impact cannot be prevented or mitigated against, or where additional monitoring is deemed necessary, this is also highlighted. The outcome of the Environmental Impact Assessment process is an Environmental Impact Statement (EIS) and an accompanying Non-Technical Summary.

In accordance with section 182C(1) of the *Planning and Development (Strategic Development) Act, 2006* it is necessary for an EIA to be undertaken for this activity and an EIS produced. The likely effects of the disposal of peat are provided in this Volume 3 of the EIS and elsewhere throughout the other Volumes of the EIS (Volume 1 & 2). With specific reference to the transport of peat, this is dealt with in Section 16 of this Volume of the EIS, which includes an assessment of the likely significant impact arising from the use of the haul route, taking account of cumulative impacts of all traffic associated with the on-shore pipeline construction and the traffic associated with material imports and workforce movements at the Bellanaboy Terminal site and Srahmore Peat Deposition site. Figure 16.1 identifies the haul route for peat transport between the site of the on-shore pipeline and the Srahmore Peat Deposition site.

Planning

The planning permission granted by An Bord Pleanála in October 2004 allowed for the transportation and deposition of 450,000m³ of peat from the Bellanaboy Bridge Terminal Site to the current application site at Srahmore. During 2005 and 2007 approximately 448,000m³ of peat was successfully excavated, transported and deposited at the Srahmore Peat Deposition site.

Approval is now sought to allow up to 75,000m³ of peat, from the on-shore pipeline development, to be transported to, and deposited at, the Srahmore Peat Deposition site. The deposition of peat from the pipeline construction is proposed to occur within the same overall activity boundary of the Srahmore Peat Deposition site as the previously granted planning permission associated with the construction of the Bellanaboy Bridge Gas Terminal. There are two factors necessitating the securing of an Approval to allow this to occur, these being:

1. the source of the peat is different from that under the existing planning permission; and
2. the volume of peat to be deposited is in excess of that allowed for under the existing planning permission.

Whilst there is an inherent link between the on-shore pipeline development and the proposed extension of peat storage and deposition activity at the Srahmore facility, to the extent that together they form a single proposal to An Bord Pleanála under the provisions of the *Planning and Development (Strategic Infrastructure) Act, 2006*, in the interests of clarity, and having regard to the essential facts that the Srahmore facility is currently permitted and in operation and that it is physically separately located to the proposed pipeline in what may be considered to be a different receiving environment to the proposed pipeline, three separate Volumes have been prepared, which together comprise an EIS for the overall proposed Corrib On-Shore Pipeline development. That portion pertaining to the proposed on-shore pipeline is provided in Volume 1 & 2, while the portion in respect of the

peat deposition at Srahmore is provided in Volume 3. The intrinsic link between the two is the traffic arising, which is addressed commonly in both Volumes 1 and 3.

Notwithstanding the fact that the proposed peat deposition site at Srahmore comprises an integral element of the overall proposed development, and is assessed as part of the overall Environmental Impact Assessment in respect of the Corrib On-Shore Pipeline development, Volume 3 has been written to ensure that it can also comprise a stand-alone EIS. This is in order to facilitate the use of the EIS in isolation, for example to accompany any future associated application for a review of the waste licence to allow for import and deposition of the 75,000m³ of peat from the on-shore pipeline development. Thus, there may be some overlap in text between Volume 1 and 3 of the EIS. Such overlap is therefore intended, and is not contradictory.

1.3 Planning History

This section relates only to the associated Planning History of the Srahmore facility. The planning and development history and context pertinent to the on-shore pipeline development is addressed within separate volumes (Volume 1 & 2) of the EIS submitted with the application.

1.3.1 *The Existing Planning Permission relating to the Srahmore Peat Deposition Site*

Mayo County Council Reg. Ref. P03/3343 (An Bord Pleanála Reference Number 16.207212)

In April 2004 Mayo County Council granted planning permission to Shell E&P Ireland Limited (SEPIL) for the development of a gas terminal for the reception and separation of gas from the Corrib gas field at Béal an Ghoile Theas (Bellagelly South) and for a peat deposition site, at An Srath Mór (Srahmore) & Áit an Bhaile (Attavally), Baingear Iorras (Bangor Erris), I gContae Maigh Eo (Co. Mayo).

SEPIL and a number of third parties subsequently appealed the decision to An Bord Pleanála.

On the 22nd October 2004, An Bord Pleanála granted permission for the proposed development.

In their decision the Board noted that they had decided to grant permission having regard to:

- (a) *“The planning history relating to the Terminal site,*
- (b) *The strategic importance of the proposed development both nationally and regionally,*

- (c) National policy as expressed in the National Development Plan 2000-2006, the National Spatial Strategy 2002-2020, the National Climate Change Strategy for Ireland, 2000 and Government policy in relation to energy supply,
- (d) The limited duration of the earthworks and construction phase, including the transportation of peat,
- (e) The availability of vegetation and plantations to provide screening on the terminal site,
- (f) The nature, extent and low lying profile of the deposition site,
- (g) The legislative requirement to obtain licences from the Environmental Protection Agency in relation to the proposed activities on the two sites,
- (h) Consents granted under the Gas Act, 1976, as amended, and the Foreshore Act, 1933, as amended,
- (i) The development objectives and the conservation and amenity provisions of the current Mayo County Development Plan 2003-2009,
- (j) The reports of the Health and Safety Authority to the planning authority and to An Bord Pleanála,

it is considered that the proposed development, subject to compliance with the conditions set out below, would not be unduly injurious to the amenities of the area or property in the vicinity, would be acceptable in terms of traffic safety, would not be prejudicial to public health and safety and would be in accordance with the proper planning and sustainable development of the area.”

1.4 Scoping of the EIA

Prior to the commencement of the EIA process, a scoping exercise was conducted to identify the key issues of concern at an early stage in the planning process. Scoping also aids site selection and identifies any possible alternatives. The results of scoping determined the scope, depth and terms of reference to be addressed within the Environmental Impact Statement. In accordance with Section 4 of the *Guidelines on the Information to be contained in Environmental Impact Statements (EPA, 2002)*, the consultation process consisted of consultation with competent bodies, statutory bodies and interested parties (Responses from this consultation process are included in Appendix 1.3 Book 3).

The following lists the various parties consulted to-date.

Competent Authorities

Mayo County Council (Planning, Roads, Environment, Sanitary and Water, Community and Enterprise)

Environmental Protection Agency

Department of Communications, Energy and Natural Resources

Prescribed Bodies / Statutory Consultees

North Western Regional Fisheries Board
Developments Application Unit, Dept. of Environment, Heritage and Local
Government (DOEHLG)
National Parks and Wildlife Service (formerly Dúchas) of the DOEHLG
Office of Public Works (OPW)
National Museum of Ireland
An Taisce

Interested Parties

Private Fisheries Owners
Bangor Angling Club
Geological Survey of Ireland

1.5 An overview of the structure of the EIS

The EIS for the Corrib Onshore Pipeline development is divided into the following:

- Volume 1 - Non Technical Summary and EIS for Onshore Pipeline Development;
- Volume 2 – Appendices for Onshore Pipeline Development;
- Volume 3 – Srahmore Peat Deposition Site EIS.

Volume 3 is further divided into three books, for ease of reference:

- Book 1 – Non Technical Summary;
- Book 2 – EIS
- Book 3 – Appendices.

The minimum information that must be contained in an EIS is specified in Part X of the *Planning and Development Acts, 2000-2007* and Schedule 6 of the *Planning and Development Regulations, 2001-2008*. The structure and content of this EIS has been based on the legislative requirements as set out in Part X of the *Planning and Development Acts, 2000-2007* and Part 10 of the *Planning and Development Regulations, 2001-2008* and the following documents, as published by the Environmental Protection Agency:

- Advice Notes on Current Practice (in the preparation of Environmental Impact Statements) (2002).
- Guidelines on the information to be contained in Environmental Impact Statements. (2002).

To allow for ease of presentation and consistency when considering the various elements of the environment, a systematic structure has been adopted for the main body of the statement. This structure is known as a “Grouped Format”. The structure is used for each particular environmental aspect as given below.

Receiving Environment

In describing the receiving environment, an assessment is made of the context into which the proposed activity will fit. This takes account of any other proposed and existing developments.

Characteristics of the Proposed Development

Consideration of the “Characteristics of the Development” allows for a projection of the “Level of the Impact” on any particular aspect of the environment.

Potential Impact of the Proposed Development

This section allows for a description of the specific, direct and indirect impacts, which the proposed activity may have. This is done with reference to Receiving Environment and Characteristics of the Development, while also referring to the magnitude, duration, consequences and significance of the development during both construction and operational phases.

Do Nothing Scenario

In order to provide a qualitative and equitable assessment of the proposed activity, it is imperative to consider the impacts should the development not take place.

Mitigation Measures

This includes a description of any remedial, or mitigation measures that are either practicable or reasonable having regard to the potential impacts.

Predicted Impact of the Proposed Development

This section allows for a qualitative description of the resultant specific, direct and indirect impacts, which the proposed activity may have, if all mitigation measures are applied. This is done with reference to both *Potential Impact of the Proposed Development* and *Mitigation Measures*, producing a definitive and concise statement of impact for the development.

Monitoring

This involves a description of monitoring required during the development and post development phase, if required. It also addresses the effects, which require monitoring, along with the methods and the appropriate agencies that are responsible for such monitoring.

Reinstatement and Residual Impacts

While not applicable to every aspect of the environment considered within this EIS, certain measures need to be proposed to ensure that in the event of the proposal being discontinued, there will be minimal impact to the environment.

Planning drawings, at A3 paper size, have been included in Appendix 1.4, Book 3 for ease of reference.

1.6 Technical difficulties and availability of data

No significant technical difficulties or lack of data were experienced in preparing the Environmental Impact Statement for the proposed Peat Deposition Site.

Significant technical information was sourced from a previous EIS prepared for the acceptance of peat from the Bellanaboy Bridge Terminal Site at the Srahmore Peat Deposition Site.

Additional technical data was available from information recorded during the construction of the Srahmore Peat Deposition site and from monitoring surveys undertaken during the construction, peat deposition activities and the post deposition stabilisation period.

1.7 Study Team and Contributors to the EIA

This Volume of the EIS for the Srahmore Peat Deposition Site has been prepared by a team of consultants co-ordinated by TOBIN Consulting Engineers. The relevant inputs of the various members of the Study Team are as follows:

Team Member	Inputs
TOBIN Consulting Engineers	Project Direction, Project Management, Production, Evaluation and Reporting. Soils and Geology. Water, Human Beings, Material Assets, Roads and Traffic, Geotechnical Review, Noise, Air Quality, Aquatic Ecology and Engineering Design.
Bord na Móna plc.	Technical advice on Construction and Operations, Rehabilitation Plan
Tom Phillips and Associates	Planning
Brady Shipman Martin,	Landscape & Visual Impacts
Ecological Advisory and Consultancy Services (EACS) and associates	Terrestrial Ecology