

22nd November 2019

Review of County Development Plan,
Forward Planning Department.,
Longford County Council,
Aras an Chontae,
Great Water Street,
Co. Longford,
N39 NH56

Email to: cdp@longfordcoco.ie

RE: Development Plan Review - Submission on Longford County Development Plan 2021-2027 Issues Paper

A Chara,

Coillte welcomes the opportunity to make this submission to Longford County Council (LCC) in response to the publication of the County Development Plan (LCDP) 2021-2027 Issues Paper.

Coillte is the largest forest company in Ireland and, amongst other things, Coillte, and Irish forestry play a critical role in contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security and contributing to a post-carbon and climate resilient economy.

Coillte was established as a commercial semi-state company in 1989, with a diverse forest estate of approximately 396,000 hectares of land. Over the last 30 years, the organisation has developed the forests and strategic elements of the land bank. It has grown the estate to over 440,000 hectares, and today provides stewardship over approximately 7% of the total land mass of the country.

During this time Coillte has provided the public with a huge range of benefits from recreation, to critical infrastructure, to environmental services. Our Forestry business underpins a thriving export-led Forest Products Sector which supports circa €2.31 Billion of economic activity.

Coillte grows forests sustainably to produce quality wood and wood products. Ireland's forest industry will approximately double in size over the next 10 years and Coillte will be at the core of this initiative with an innovative supply chain and a consistent reinvestment in the next generation of forests. Our forests and forest products are playing an increasingly important role in mitigating the effects of climate change. The forest

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sector is also providing around 12,000 jobs today, mostly in rural Ireland.

Coillte has approximately 900 employees across Ireland and the UK, and comprises three discrete businesses, Land Solutions, Forest and Medite Smartply (Panels). Our vision is to make Coillte the best forestry and land solutions company in Europe.

Within Coillte, Land Solutions and Renewable Energy are active asset development and management businesses providing innovative commercial solutions to enable the attainment of key national policy objectives particularly those that are prescribed by the National Planning Framework (2018). The businesses span a wide range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism and agriculture. Coillte has a longstanding heritage in the spheres of sustainability, recreation and community and a significant track-record in the renewable energy arena (specifically onshore wind through the development and construction of four wind farms totalling 230MW representing a total investment of over €400 million between 2010-2017).

We believe that Coillte Land Solutions and Renewable Energy businesses have the experience and expertise to support Longford County Council and the Eastern and Midlands Regional Assembly to realise one of the Region's key principles around climate action, namely *"Climate action, by enhancing the climate resilience and accelerating the transition of the Region to a low carbon society."*

As mentioned above Coillte is one of the biggest developers of renewable energy in the State and has enabled in excess of 40% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer.

Coillte is also particularly proud to have helped deliver Center Parcs to Longford. The development of this site created 750 jobs during construction and resulted in over 1,000 long term associated jobs.

It is estimated that the location of Center Parcs at Ballymahon will generate in the region of 30million euro per annum to the local economy.

Coillte has engaged positively with Longford County Council throughout the years and wishes to continue this important collaboration.

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1.0 The Challenge of our Generation - Climate Action Plan 2019 and Renewable Energy Targets

On 17th June 2019 the Government published the 'Climate Action Plan 2019' (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that *"We [Ireland] are close to a tipping point"* and *"decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge."* (Exec. Summary pg. 8)

In particular the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from its 2017, 12 million tonnes of CO₂ equivalent emissions, to 4.5million tonnes by 2030. In other words a massive reduction of 7.5million tonnes (62.5%).

Other sectors namely Transport, the Built Environment, Agriculture and Industry are also tasked with significant CO₂ emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO₂ reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

In this regard the 2019 CAP provides a roadmap of what must be achieved and requires 70% of all our electricity to come from renewable energy sources by 2030. This almost doubles our current target of 40% by 2020.

To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030.

To put this scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time.

2.0 The Role of Local Authorities and Local Authority Planners

The scale of the CAP ambition is unparalleled and the pace of renewable energy delivery and penetration needs to increase exponentially.

Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this ambition in the form of plan-led 'Renewable Energy

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Strategies' (RESs) as an utmost priority.

Planners have the unique skills and experience to establish a clear and consistent plan-led approach to the delivery of this considerable quantum of renewables. Planners have a responsibility to ensure an appropriate, plan-led framework is in place to provide certainty and predictability to the market and to ensure the appropriate balance between all land use constraints and opportunities, and community and other interests.

All 34 local authorities signed a charter on 29th October 2019 committing to decarbonising their activities, to pursue sustainable development and to build climate resilience into every aspect of the work they do. On the occasion of the launch of the Charter Minister Bruton said *"I am determined that government both at central and local authority level will lead the way in our response to climate change"*. The development of Renewable Energy Strategy(ies) and their incorporation into the making of County Development Plans is a natural extension of this commitment.

3.0 Planning Policy Hierarchy and County Development Plans

The mandate for action has been clearly set out in the CAP 2019 and also in policies and objectives in the National Planning Framework (2018).

In addition, the Office of the Planning Regulator (OPR), which was established in 2019 with the aim of enhancing the proper oversight of the planning system in Ireland, wrote to Local Authorities within the Eastern & Midlands Region Assembly (EMRA) area advising them to maximise the output of renewable energy sources in line with national government policies on climate change.

The EMRA Regional Spatial and Economic Strategy (RSES) also clearly recognises the urgent need to decarbonise the energy sector (Section 7.9 Climate Change). Policy RPO 7.35 and 7.35 of the EMRA RSES state:

"RPO7.35: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones."

"RPO 7.36: Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications

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relating to ‘Wind Energy Development’ and the DCCA Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.”

Coillte strongly believes the identification of ‘Strategic Energy Zones as areas suitable for larger energy generating projects’ should be set in the context of a plan-led approach, namely a holistic Renewable Energy Strategy for the entire EMRA Region¹.

Coillte believes that this approach would ensure inter county consistency in relation to designating renewable energy zones, identifying landscape sensitivities and required set-back distances.

However, notwithstanding our strong belief in a holistic Regional Renewable Energy Strategy, Coillte recognises that time is of the essence and that RPO7.35 is not time bound and may not materialise in the short term. With this in mind, Coillte recommends that each local authority in the Region incorporate a RES into the making of its individual County Development Plan.

In so doing each local authority must engage closely with neighbouring local authorities and with other local authorities in the EMRA. A regional steering group comprising planners from each local authority and potentially led by Longford planners and/or EMRA, would be optimum. A representative from the DHPLG should also be requested to join the steering group.

Furthermore it is imperative that a set of guiding principles is agreed and used by all local authorities in developing local authority RESs. To this end the methodology and principles set out in “SEAI’s Local Authority Renewable Energy Strategy” [2013] remain valid and should be used.

[<https://www.seai.ie/publications/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf>]. The SEAI methodology is based on the 4 core steps as follows:

- The Preliminary Phase, which clarifies the local need for a LARES and identifies whether strategic environmental assessment or appropriate assessment are required;
- Step 1: The Policy Review, identifying all renewable energy and other relevant policies;
- Step 2: Identify the Renewable Energy Resources and their potential for exploitation;
- Step 3: Review the Constraints and Facilitators that might affect exploitation;
- Step 4: Develop the Local Renewable Energy Policy

¹ It should be noted that the DCCA is also in the process of drafting a ‘Renewable Electricity Policy and Development Framework’. Our understanding is that this Plan will also nationally identify areas for large scale renewable projects. The current status of this document is unknown at time of writing. Furthermore the interaction of this document with the National, Regional and Local Planning Policy hierarchy is also unknown. For this reason no explicit link/reference is made to this document in this submission.

Based on Coillte's extensive experience of developing and facilitating wind farms in Ireland we suggest that the following recommendations complement the principles in the SEAI document:

- Each local authority carry out a full assessment of all lands within their County and classify areas for renewables using terminology which is agreed in advance with the Steering group (referred to earlier). Such terminology could include: 'No-Go', 'Open to Consideration', and 'Preferred' areas.
- Each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. As above an approach and terminology should be agreed in advance with the Steering group. Such terminology could include 'Low', 'Medium', and 'High' sensitivity.

It should be noted that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason we suggest the SEAI Wind Atlas, or any similar general wind resource data, is not used as a hard constraint when identifying suitable areas for on-shore wind.

In addition, we recommend that existing grid constraints are not considered hard constraints when preparing RESs. This is because, amongst other things, the development of the Grid will react to (planning) consented developments where necessary. In essence this means that a planning consent, or indeed a critical mass of planning consented projects triggers grid development/reinforcement where necessary.

This issue of existing grid availability was recognised in the SEAI [2013] document which suggested that "*local authorities may consider policies and objectives which could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential*". Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential. The EMRA RSES has excellent policies in relation to grid development [RPO10.19-10.24] inclusive and Coillte requests that these are mirrored in the Longford CDP.

3.1 Wind Energy Development Guidelines 2006 Focussed Review and Local Authority Wind Energy and Renewable Policies

Coillte acknowledges and understands the requirements of Circular PL5/2017 "*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review*" and the statements contained therein in relation to:

"operating existing development plan policies and objectives [in relation to wind energy and renewables] until the completion of a focussed review of the Wind Energy Development Guidelines 2006"

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Also the obligation on local authorities in these Guidelines to “*acknowledge and document national policy on renewable energy*” in the development plan and “*indicate how the plan will contribute to realising overall national targets on renewable energy...*”.

It should be noted that according to the CAP 2019 it is anticipated the WEGs will be published imminently for public consultation. (CAP 2019 Action 21 stated that Q4 2019 would see the DHPLG finalise Wind Energy Guidelines).

In relation to the SEAI LARES methodology; this proposes the use of the WEGs’ ‘sieving’ approach in Step 3. Based on the CAP anticipated timelines, the focussed review of the WEGs will occur in good time to fit into the development of county RESs, and before Step 3 is likely to occur.

Furthermore, according to the “Interim Guidelines” (referred to above), the key focus of the review is on noise, set-backs, shadow flicker and community interactions. There is no indication that the current ‘sieve’ approach will change. Thus the updated WEGs need only be in place at the time of final adoption of the CDP.

4.0 Working in Partnership

The scale of the overall CAP ambition is considerable and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure.

Coillte has an experienced team in the area of wind farm planning and development and is available to work in partnership with Longford County Council to support the realisation of the CAP targets.

As a semi state company, Coillte profits belong to the state and are returned by dividend to the shareholder on an annual basis. We operate a ‘Fair Play Model’ of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments.

Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of Community Benefit Funds and we are also working hard in the area of Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Longford County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the County. We are rooted in communities all over Ireland and our record of providing land for and facilitating local sports clubs is a good demonstration of that local commitment. We will also continue to work with communities and Longford County Council to facilitate the development of a wide range of community and sporting facilities, ranging from playing pitches and clubhouses to running tracks, all within easy reach of local communities.

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The zoning of appropriate lands for the purposes of commercial, industrial, residential, tourism and recreational uses is considered essential to ensure the availability of appropriate land-banks into the future. Coillte would like to continue to work in partnership with Longford County Council to identify and develop suitable lands that address local needs and to ensure the necessary infrastructure, services and supports are in place.

Timber is without doubt one of the most environmentally-friendly and versatile building materials available, and being a natural carbon sink can be considered truly renewable. Coillte requests that Longford County Council promote the use of sustainable timber products wherever possible in building and construction projects.

5.0 Conclusion

Key asks of the Local Authority in the preparation of the Longford County Development Plan:

- Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process.
- Develop a Renewable Energy Strategy for the county based on the principles of the SEAI LARES as part of the County Development Plan review.
- Lead the EMRA region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speed and existing grid capacity issues are not considered constraints.
- Work in partnership with other Government Agencies and third parties, including the public, to achieve these goals.
- Continue to support sustainable rural based enterprises such as forestry in the County.
- Promote the use of sustainable timber products where possible.

If you have any queries in relation to any issues we would be happy to discuss. Please contact the undersigned.

Mise le meas.



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