

DWP - 79

Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Longford County Council,
Áras an Chontae,
Great Water Street,
Longford
18th January 2021

Re: Submission on the Draft Longford County Council Development Plan 2021 – 2027.

Dear Sir/Madam,

Bord na Móna welcomes the opportunity to make a submission in relation to the Draft Longford County Development Plan 2021 - 2027.

Since its foundation Bord na Móna has been part of the socio-economic and cultural fabric of County Longford. The company has contributed significantly to economic development and employment in the county and in doing so supporting many communities throughout the County. This is reflected in the geographic footprint the company occupies within the County which extends to just under 7,000 hectares: representing just over 6% of the entire functional area and 9% of Bord na Móna's land bank.

As a global community we are faced with the challenge posed by climate change and as a society we have acknowledged the need to meet this challenge. In keeping with this, Bord na Móna is committed to decarbonising its business and while we have embarked on this journey some time now, the pace of this transition has increased in recent years and continues to increase at pace. In January 2021, the company announced the cessation of industrial peat extraction across all of its lands including its property in Co. Longford. This is a very significant step for Bord na Móna. The impact this transition is having on the communities which we support, and the wider economy and social fabric of Longford is not lost on us. As we continue this challenging journey we are committed to repurposing and applying our assets, not least our land assets, to support and develop the future economy of Longford.

However, with these challenges come opportunities, some which we have identified such as in the area of renewable energy, more which are in development such as biogas and more still which we have yet to even identify. In finalising the new County Development Plan, it is important that we not close the door to the range of future commercial and job creation opportunities which may be supported by Bord na Móna's land and property assets within the county.

In this context it is important to reflect on the nature and uniqueness of this significant landholding. While somewhat fragmented in geographical spread, much of the company's estate is characterised by large tracts of land. This is a somewhat uncharacteristic feature in the context of Irish landholding and therefore offers unique opportunities for a multitude of uses not readily suited to smaller dispersed landholdings. This, coupled with proximity to the national electricity infrastructure and

relative isolation from residential areas, is particularly suited to the development of renewable energy such as windfarms and solar farms and other large-scale energy dependant industrial development. Most of our peatland has been utilised for industrial peat extraction for decades and consequently much of the overlying peat deposits has been cutaway. As we exit peat extraction activities, this cutaway will be stabilised through the implementation of a rehabilitation programme with significant portions of these lands rewilding and supporting biodiversity and other ecosystem services. We believe that it is possible to successfully integrate this emerging biodiverse and amenity rich landscape with other commercial, industrial and employment generating uses.

This is exemplified in the transformation of our Mountlucas property in county Offaly which has changed from a site with a single use (peat harvesting) to one hosting a rich mosaic of complimentary activities. Over the last decade an 84MW windfarm has been developed on the site. The windfarm supplies over 50,000 homes with renewable electricity while providing a sustainable income which in turn supports significant local community investment. With the wind assets occupying a mere 5% of the 1,100 hectare site, this rehabilitated cutaway has helped significantly mitigate carbon emissions and also developed into a rich ecosystem with a range of different habitats for native plants and animal species. The site also provides a new significant public amenity with over 10km of walking/running/cycling tracks for people living in the local communities. In addition, the company has also developed a number of new business projects on the site including the first closed loop re-circulation aquaculture facility at this site and another involving the cultivation of high value herbs used in the production of alternative medicines and food supplements.

In 2011 Bord na Móna published its long-term land use strategy, Strategic Framework for the Future use of Peatlands. Much of the strategy outlined in this framework document still holds true and is relevant; however, with the significant and accelerated change that has taken place in the intervening period and with the emergence and identification of new potential future land uses, we have engaged in a review of this framework. We expect to publish a revision of the Strategic Framework in the coming months and it will be made available to all stakeholders.

The consultation process for the Draft Longford County Development Plan invites submissions across a broad range of important topics and we believe Bord na Móna can make significant positive contributions across many of these areas. In particular, we believe we have a significant role to play in delivering on climate action, energy policy, supporting biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

This submission will provide commentary on the Draft Plan in addition to information on how Bord na Móna is working to support and endorse National, Regional and Local policy, objectives and targets.

Chapter 3: Climate Change

Bord na Móna welcomes the content and policies outlined in Chapter 3 which sets out Longford County Councils commitments with respect to Climate Change, Decarbonisation and transitioning to a low carbon and climate resilient County.

In particular, we welcome the Councils commitment to supporting collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders with respect to integrated peatland management and support for the rehabilitation and/or re-wetting of suitable peatland habitats as outlined in Policy CPO 3.9.

Many of the commitments are very closely aligned with the objectives of the aforementioned 'Strategic Framework for the Future Use of Peatlands' document and previous commitments made by Bord na Móna in the National Peatlands Strategy and other national policy and strategy documents, and our ongoing transition to diversify into new sustainable business areas in order to strengthen the company and support jobs in the midlands into the future.

Central to this sustainable transition is the use of our land bank for a range of beneficial commercial, environmental and social uses such as renewable energy, industrial uses (including but not limited to data centres), biomass cultivation, aquaculture, herb cultivation, ecosystem services and biodiversity as well as recreation and tourism. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located.

As part of our peatland rehabilitation programme Bord na Móna will look to re-wet residual peat in our landbank and reduce carbon emissions. In time, there is potential to restore some carbon sinks in suitable conditions. In the past 3 years, Bord na Móna has carried out peatland rehabilitation and re-wetting on a number of its bogs. Bord na Móna has carried out some rehabilitation in Longford in the past few years. This includes drain-blocking around Lough Bawn pNHA, which will indirectly support this important wetland, and re-wetting at Corlea Bog, which has enabled and supported the amenity development at this site. Corlea is an excellent example of how the landscape of the Bord na Móna bogs will change in response to the cessation of peat extraction and ongoing rehabilitation. Peatland rehabilitation can also be successfully combined with development of renewable energy. While renewable energy infrastructure requires drainage, re-wetting can be carried out on cutaway between turbines.

The Government has recently committed to supporting a Peatlands Climate Action Scheme (PCAS) with Bord na Móna. This scheme will look to use enhanced rehabilitation measures to optimise climate action benefits by developing suitable hydrological conditions for re-wetting and setting sites on a trajectory towards becoming naturally functioning peatland ecosystems. Former production bogs such as Edera, which has deep residual peat, have potential to follow a trajectory towards the development of embryonic Sphagnum-rich communities, which are known to be peat-forming. Other bogs have been cutaway, have very little residual peat and will develop other habitats. Re-wetting to optimise climate action benefits can be integrated and balanced with other land-uses such as renewable energy development and will deliver significant climate action and ecosystem service benefits. The development of naturally functioning peatland ecosystems will lead in time to the restoration of carbon sequestration potential. This will support the main carbon mitigation land-use objectives of the National Climate Action Plan, as reflected in the Longford County Development Plan, while also providing other benefits for biodiversity and other ecosystem services.

Peatland rehabilitation and decommissioning as part of the PCAS is expected to begin in 2021. The scheme is expected to run between 2021-2025. Remaining milled peat stocks are expected to be removed during the period of the scheme. Some BnM railway infrastructure is expected to be retained during the period of the scheme for operational reasons and to facilitate the peatland rehabilitation. It is not planned to develop any Bord na Móna cutaway into agricultural grassland as part of this scheme.

As can be seen from our Strategic Framework for the Future use of Peatlands, Climate Action is considered very important to the organisation and Bord na Móna can achieve these objectives in harmony on our cutaway and cutover peatlands with other commercial, industrial and employment generating land uses such as renewable energy, tourism and recreation.

Other Observations in Chapter 3

Section 3.3.9 Midlands Just Transition Fund 2019

In relation to State Aid clawbacks to grants (provisionally) allocated under the Just Transition Scheme, it is incumbent that support under the Just Transition Fund, while compliant with State Aid requirements is not limited by the 'catch-all' General Block Exemption Regulation. Particularly limitations relating to aid intensities.

Chapter 5: Transport, Infrastructure, Energy and Communications

Section 5.8 – Renewable Energy

The National Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures. Furthermore, the National Planning Framework, Project Ireland 2040, (NPF) contains a specific objective for Ireland to transition to a competitive low carbon, economy by the year 2050 and to shift from predominantly fossil fuels to predominantly renewable energy sources. This is echoed in the Regional Spatial and Economic Strategy for the Eastern and Midlands Region which calls out the need for us to “better leverage [our] natural resources to increase our share of renewable energy... and harness the potential for a more distributed renewables-focused energy system”.

Given the unique nature, character and scale of Bord na Móna's cutaway bogs we believe that the future use of these lands has the potential to make a significant contribution to national policies and objectives across a range of sectors including renewable energy, industrial development and job creation in rural areas, ecosystem services and biodiversity as well as tourism, amenity and recreation. In many cases these uses can be co-located thereby providing enhanced economic benefits to the areas in which such developments are located through direct and indirect employment opportunities. The optimisation and the realisation of the full potential value of the company's land bank is dependent on national, regional and local planning.

The suitability of peatlands for renewable energy developments in particular wind energy has been highlighted in the National Planning Framework (Project Ireland 2040) and in the Regional Spatial and Economic Strategy for the Eastern and Midland Region. In this regard, Bord na Móna warmly welcomes the inclusion of the following text in Section 5.8.1.1 of the Draft Plan on Commercial Wind Energy Developments which states:

“The county is well endowed by vast tracts of cutaway peatland, predominately along the western fringes of the county, much of which is under the ownership of Bord na Móna. With a strong history of energy production and an extensive electricity transmission network in place, the potential exists in such peatland areas for a smooth transition to renewable energy sources”

In addition, Bord na Móna welcomes, the many specific policy objectives listed in Section 5.8, in particular the following:

CPO 5.129 Prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources. This strategy will support the development of renewable energy infrastructure to deliver government objectives in relation to energy efficiency and the transition to a low carbon future.

and

“CPO 5.137: Encourage proposals for commercial wind energy developments to be located on cutaway peatlands in those areas identified as having wind potential within the county, as defined in Appendix 2, subject to environmental, landscape, habitat and wildlife protection requirements being addressed.”

These policy objectives point toward the significant potential for renewable energy development in County Longford. A significant portion of our landholding in Longford has already been committed to a wind energy project, namely the recently consented Derryadd Wind Farm in the southwest of the County. Bord na Móna will now work towards getting this project constructed in order to develop the project into an operational renewable generating asset.

However, we have concerns about the Map referenced in Policy CPO 5.137 and included in Appendix 2. This map outlines ‘Areas of Wind Farm Potential’ in the county and appears to have been developed using SEAI data on wind speeds across the county.

It is our view that cutaway bogs will play an important role in the generation of renewable energy into the future and it is our intention to continue developing renewable energy projects on our bogs. In this regard, the map produced appears to exclude many Bord na Móna bogs in the county which is at odds with the Council’s wider commitment to support and enable renewable energy generation on peatlands. We would urge the Council to carry out a full assessment of renewable energy development in compliance with the methodologies outlined in SEAI Methodology for Local Authority Renewable Energy Strategies (LARES) and with the current Wind Energy Development Guidelines (2006) and the Draft Revised Guidelines (2019). This will ensure that a consistent and transparent renewable energy zoning methodology is in place for all developers.

On a similar note, we also request that in parallel with the development of a Renewable Energy Strategy, that the Council reviews the Landscape Character Assessment for the County to ensure a consistent approach to the determination of lands that are suitable for the development of wind energy projects in the County. This parallel review will result in greater clarity regarding the suitability of lands for wind energy development and will assist developers eliminate uncertainty at project inception stage.

With respect to wind energy developments we also welcome the inclusion of CPO 5.135 which states that it is a County Policy Objective to “have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued in relation to sustainable energy provisions”.

However, we respectfully request that the wording of this policy is amended to directly reflect the wording provided in Policy 7.36 in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region, which states that:

“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 relating to ‘Wind Energy Development’ and the DCCAE 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”.

Finally, we also suggest that provision is made for the inclusion of Policy RPO 7.37 from the RSES in the finalised County Development Plan. This policy states that “a bioeconomy plan for the Region

should be developed that outlines the capacity of the Region to supply the range of bioenergy resources required for the fuel mix as well as the current and projected consumption requirements for growth in this market". Inclusion of this policy will ensure that the finalised plan is supportive of the potential for renewable energy across the technological spectrum with respect to decarbonisation of the energy sector

Other Observations in Chapter 5

Section 5.6 environmental services

Having reviewed the County Policy Objectives (CPO) on page 156 of the draft plan, Bord na Móna are suggesting the addition of a new CPO and would welcome your thoughts:

"Ensure that all waste collectors and householder who use the services of authorised waste collectors are fully compliant with the Waste Management Act 1996, as amended and the Waste Management (Collection Permits) Regulations 2007, as amended."

Section 8.8 page 171 it states

"Biomass by comparison to other forms of renewable energy is comparatively expensive, with a limited availability of indigenous biomass, high import costs and its inconvenience in comparison to other fuels, such as oil and gas"

Bord na Móna would like to mention that there are a number of statements made in this paragraph There is a considerable volume of indigenous biomass available and while import costs exist the comparison is being made with fossil fuels. It is important to also note that unlike wind, solar and other forms of RES, biomass can be easily stored and used when required.

Chapter 8: Economic Development

Bord na Móna has played, continues to play and has the potential to play a significant role in the economic development of the County. As set out earlier, with the unique nature of our landholding, industrial, remote and with access to key infrastructure; opportunities exist to support industries that require scale which is not readily achievable elsewhere in the country let alone the county.

As part of the land transition programme, Bord na Móna is continually reviewing its property strategy to determine future industrial uses for the holdings. Whilst buildings such as workshops and stores comprise a small portion of the holding, these buildings present opportunities for the repurposing of these facilities for new sustainable industries. In recent months, the company has repurposed its former briquette production facility in Littleton in County Tipperary as a plastics recycling facility supporting 40 new jobs. Similar opportunities will exist for more of our facilities as we exit peat extraction and in this regard we welcome the intent of policy CPO10.23 which seeks to "support the repurposing of the Lough Ree Power Station and Bord na Móna Mount Dillon infrastructure and associated work depots for alternative uses in association with the Just Transition process".

Where possible the industrial potential of Bord na Móna's property will be harnessed to support job creation, whether a proposed project requires the provision of buildings, sites, infrastructure, green energy or other industrial uses.

By acknowledging this potential the Council should now stand positioned to support appropriate commercial and industrial development on Bord na Móna's land and can do so secure in the knowledge that given the scale and spread of Bord na Móna's land and property assets, suitable commercial and industrial development can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape: as demonstrated by our property at Mount Lucas in County Offaly and as proposed in our wind farm development plans at Derryadd.

Chapter 10 Tourism

Tourism continues to grow in the county and has the potential to contribute significantly to the future economic development of the county. Located within Ireland's Hidden Heartland the county is endowed with a rich natural landscape including the River Shannon, the Royal Canal, peatlands, lakes and forestry offering significant potential to deliver a unique and expansive ecotourism experience. Central to the development of an integrated ecotourism experience is the provision of quality cycling, walking and hiking routes connecting strategic tourism infrastructure, towns and villages.

In keeping with our Brown to Green strategy Bord na Móna through its large land holding in County Longford has the potential to enhance tourism and community amenity initiatives by providing connectivity and access to a rehabilitated landscape. This is addressed later in our submission in the section entitled 'Natural Heritage and the Environment' and 'Green Infrastructure'.

Now as we transition away from peat extraction further significant opportunities to enhance and expand an integrated network of greenways across our peatlands will emerge. In some cases, future company commercial and renewable opportunities will first need to be considered but the potential exists to provide links with the broader greenway and blueway network across the county including the Royal Canal Greenway, the Shannon Blueway, the Inny blueway and Camlin Blueway. Our experience to date demonstrates how both Greenway Infrastructure (amenity) and renewable opportunities can co-exist successfully.

Chapter 12: Natural Heritage and the Environment

As outlined in the preceding section, our peatland rehabilitation programme will reduce carbon emissions. However, it will also enhance and support biodiversity in Longford. Already there are many diverse sites and habitats developing on Bord na Móna lands that support rare and protected species and species under pressure in the wider landscape. Examples of this in Co. Longford include Lough Bawn pNHA, which contains Annex I bog woodland and transition mire habitats, and Knappogue Bog, which attracts wintering wildfowl and is an important site for Whooper Swan. The emerging cutaway across the BnM estate continues to develop habitats and support species that are under pressure in the wider landscape, such as Lapwing and Skylark.

Bogs located on the eastern margin of Co. Longford and Co. Westmeath are part of the Bord na Móna Raised Bog Restoration Programme and have significant biodiversity value. These bogs were drained but did not have significant amounts of peat removed. Clonwhelan Bog has already had an intensive drain-blocking programme and is restored. Drain-blocking is ongoing at Mostrim Bog. Clynan Bog and Glenlough Bog are also ear-marked for future restoration. These bogs will support national biodiversity and climate action objectives as Annex I active raised bog will re-develop. Mostrim has some of the last remaining breeding Curlew in the county.

Many of the former industrial peat production bogs in Co. Longford have pumped drainage. It is expected that as pumping stops or is reduced that wetlands will form in many of the cutaway bogs. Corlea Bog is a good example of the re-wetted cutaway landscape that is expected to develop in the future. There will be a mosaic of habitats developing from wetlands to dry bog woodland that will reflect underlying environmental conditions.

Emerging cutaway is recognised as having significant biodiversity value and other ecosystem services. Generally these habitats can be successfully integrated with other land-uses. In some cases there can be trade-offs between development and ecosystem services like biodiversity (e.g. some bird species and renewable wind energy). Bord na Móna will look to minimise these trade-offs, where possible through robust site selection, planning and mitigation. While some sites will have multiple land-uses, other sites will be managed with biodiversity or other ecosystem services as their primary land-use. Bord na Móna note the inclusion of the Mid Shannon Wilderness Park and proposed Biosphere Reserve within this draft development plan. This proposed park includes much Bord na Móna land, along with other land-owners. Bord na Móna support the development of this proposed park and Biosphere Reserve as it aligns with Bord na Móna's own land-use strategies. Bord na Móna welcome the inclusion of text

In Chapter 10, Page 296 of the draft CDP it states:

"The Mid Shannon Wilderness Park and proposed Biosphere represents one of Longford's primary tourism offerings going forward (see Annex 8: Mid Shannon Wilderness Park). The Corlea Amenity Park represents a first step in the development of the Mid Shannon Wilderness Park. Much of the land involved is in State ownership.

Existing natural amenity areas such as Lough Ree, the Shannon, the Royal Canal and the future rehabilitated Bord na Móna bogs, can be combined to create the Mid Shannon Wilderness Park. This sustainable development project shall be mutually inclusive of any future uses that Bord na Móna might pursue for their land bank including renewable energy projects. The use of the existing bog rail banks as additional walking/cycling tracks are currently being investigated and developed (2020).

While Bord na Móna supports this development we also need to ensure the proposed amenity is compatible with our integrated land-use strategy (such as renewables, industrial, and amenity), which are in support of other national policies and maximising the overall potential of the land-bank. The Bord na Móna land bank provides a unique opportunity to develop a network of recreational and amenity uses across the midlands and it is important that this is developed in a structured and planned way with all the necessary stakeholders. It is also important to recognise that there is an expectation that any future amenity projects would be funded through appropriate grant aid schemes.

Section 12.9 Peatlands

We note the references throughout the draft plan to the preparation of a comprehensive after use framework plan for the peatlands and related infrastructure, in particular the inclusion of Policy CPO 12.45.

As outlined earlier in this submission, Bord na Móna published its first long-term land use strategy, Strategic Framework for the Future use of Peatlands in 2011 and much of it holds true to date. However, with the significant and accelerated change that has taken place in recent times, we have engaged in a review of this framework which we expect to publish in the coming months, and which will be made available to stakeholders.

As we transition away from commercial peat production and decarbonise our business the rehabilitated cutaway will naturally revert to a rich and diverse natural habitat enhancing biodiversity and supporting other ecosystem services. We are committed to protect and enhance this ecologically rich landscape and firmly believe that we can do so while integrating other sustainable land-uses, including renewable energy and other commercial development: as demonstrated at our Mountlucas property as discussed earlier.

Chapter 13: Green Infrastructure

Chapter 13 of the draft plan addresses the importance of Green Infrastructure for the County and the economic, environmental and social benefits of connecting such infrastructure, particularly in rural areas.

Section 13.7 addresses walkway and cycleways along rivers, canals, disused railway lines and peatlands and the opportunities such infrastructure would bring in terms of tourism. There is also reference in Section 13.7 and in Appendix 8 to creating peatways through the landscape connecting biodiversity and cultural hotspots.

We welcome this focus with respect to the tourism opportunities that are possible and acknowledge the potential for linkage of greenways and blueways through our peat lands (via 'peatways'). We recognise the potential of our cutaway peatlands for recreation and tourism uses from the success of the Lough Boora Discovery Park and consider that 'peatways' across Bord na Móna bogs can be integrated successfully alongside other developments or biodiversity and nature conservation measures etc. with minimal impacts.

Bord na Móna have made available to the public significant green infrastructure throughout County Longford and further future potential exists. Bord na Móna enabled green infrastructure in the county include Corlea Trackway Visitor Centre and the associated wetland and peatland walking and cycling tracks (in association with the NPWS and Longford County Council); Derryogue and Knappogue greenways which provide connectivity to the towns of Lanesboro and Clondara (in association with Longford County Council). In addition, the proposal for the recently consented Derryadd Wind Farm includes an amenity plan with direct connectivity to the Royal Canal, with opportunities for connectivity through other Bord na Móna bogs in the future. Given the proximity of our peatlands to the Shannon basin, Bord na Móna are positioned to make significant contributions to future green infrastructure initiatives, not least the proposed Mid-Shannon Wilderness Park.

The Bord na Móna Biodiversity Action Plan 2016-2021 supports the development of green infrastructure and supports the integration of such infrastructure with future commercial development where appropriate as well as adjoining areas of conservation of high biodiversity value such as the river Shannon and its associated habitats and the Royal Canal. Future BnM land-use strategies and future BnM commercial development will support the Longford County Development Plan in the development of green infrastructure. The Bord na Móna Biodiversity Action Plan represents a clear commitment from the Company to plan and execute the future use of its peatlands in an ecologically sound manner.

Chapter 9 Supporting Rural & Urban Regeneration

Accessibility and connectivity to amenities is crucial. Cutaway peatlands have enormous potential to provide quality recreational areas for both local and national users. By developing cycle and walkways the greater region has the potential to become more accessible to all sections of society. If done in conjunction with a well thought out tourism plan there is real potential to create sustainable tourism jobs within the local communities.

That said, it is important to maintain a balance which recognises the suitability of a particular site as a potential future amenity or as a site which can be developed for the purposes of commercial activity: which will also have the effect of strengthening local rural economies and communities.

Bord na Móna are pioneers in the development of community benefit schemes providing significant funds for investment in catchment communities for rural, town and village regeneration supported by the commercial renewable energy developments such as Mountlucas in County Offaly.

Such funding presents a major opportunity for communities near wind and solar farms to benefit from flexible, long-term, private sector investment with the potential to draw in additional matched funding under the Renewable Electricity Support Scheme (RESS). With the Government target of 70 per cent of electricity coming from renewable sources by 2030, it is conservatively estimated that the cumulative value of community benefit contributions from 2020 to 2030 would be approximately €250 million for wind energy alone.

This is not just an opportunity for the communities living close to renewable energy projects; it is a green opportunity – a significant portion of the money invested in community benefit funds will be used to drive the decarbonisation of communities, to cut energy bills for families and fight fuel poverty, invest in the green economy infrastructure and create jobs.

In conclusion, this period of significant transition for Bord na Móna is by extension a period of significant change for Longford County, in particular, the significant impact this transition will have on the economy and employment. While there are many challenges, there are also many opportunities and in framing our future County Development Plan, we need to be cognisant of these opportunities and ensure that the final plan supports this potential.

Yours sincerely,

Lisa Kealy

Land Use Manager

Bord na Móna Plc.

