

Administrative Officer,
Draft County Development Plan,
Forward Planning Department,
Longford County Council,
Áras an Chontae,
Great Water Street,
Longford.

Date: 10/08/2021

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

Dear Sir/Madam,

Bord na Móna has gone through an historic change to become a climate solutions company focusing on Renewable Energy, Peatlands Rehabilitation and Recycling. We are also changing how we use our land and are engaging with local authorities and groups regarding walkways and cycleways on Bord na Móna lands.

Bord na Móna announced in 2018 the company's "Brown to Green" strategy. The strategy enabled Bord na Móna to plan for and manage the elimination of its dependence on peat. It also made it possible for the company to grow a new business of scale, that continues to sustain significant employment, that is focused on the delivery of national climate policy objectives.

The investments made in the years since 2018 have enabled the company to take a leading role in delivering key aspects of national climate action policy. Last year it was announced that Bord na Móna was to raise €1.6billion to fund a series of major climate focused projects across its 200,000-acre landholding. These include a series of largescale climate action projects, such as wind, solar energy, battery storage, biomass, renewable gas and demand-side assets for delivery in this decade. By 2030, Bord na Móna will be able to supply a third of Irish homes with renewable energy.

The Climate Action Plan which was published in 2019 sets out a number of targets for the decarbonisation of the electricity sector in order to meet 2030 emissions reduction targets. These targets include increasing the electricity generated from renewable sources to 70% by 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures and onshore wind will comprise the majority of these projects. 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 to support the transition to a low carbon economy"*.

In January 2021, Bord na Móna announced its decision to permanently end all peat harvesting in line with its change from a traditional peat business into a climate solutions company fully focused on renewable energy generation, recycling, peatlands restoration and the development of new low carbon enterprises.

Most recently on the 15th July 2021, the Taoiseach Micheál Martin TD and Minister Eamon Ryan TD, Minister for the Environment, Climate and Communications joined us at Cloncreen Wind Farm in east Offaly to announce details of over 1400 jobs being created by Bord na Móna. This event particularly highlighted Bord na Móna's transformation to a climate solutions company and its commitment to delivering key aspects of national climate action policy. Bord na Móna is having a significant economic impact on the midlands of Ireland, creating over 550 jobs over the past 18 months as we develop renewable energy and recycling infrastructure and progress our peatland rehabilitation operations. Our plans will also involve the creation of an additional 885 jobs in the coming 4-5 years through further expansion of our climate solutions businesses, partnerships with third parties and the construction of a significant portion of Ireland's renewable energy infrastructure. We now estimate that direct employment within the company will return to pre-transition (2018) levels within the next five years.

To date, Bord na Móna has contributed to economic development and employment in County Longford and in doing so supporting many communities. The announcement by Taoiseach Micheál Martin and Minister Eamon Ryan shows the continued part Bord na Móna intend to play on the socio-economic and cultural fabric of the Midlands Region.

Bord na Móna broadly support the relevant policies and objectives related to biodiversity, peatlands, wetlands and green infrastructure outlined in the Draft Longford County Development Plan. 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 with high biodiversity value such as the Grand Canal and its associated habitats and the River Shannon. Other future Bord na Móna land use strategies and future commercial development will support the 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. In every instance future climate action projects and renewable energy developments are considered as a precursor to the development of amenity and to land use plans.

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 contribution across many of these areas. In particular, we believe we have a significant role to play in delivering on climate action and energy policy, supporting natural heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial developments and supporting rural and urban regeneration.

This submission will provide commentary on the proposed Material Alterations of the Draft Longford County Development Plan.

Bord na Móna



Sean Creedon

Planning and Advocacy Manager

Chapter 5: Transport, Infrastructure, Energy and Communications

Section 5.8: Renewable Energy - Proposed Amendment CH 5.32

We note the proposed text for insertion into Section 5.8 of the Draft Plan which states the following:

“The Council will undertake an assessment of the metrics including an assessment of the proportion of the national 4GW of renewable energy target to be allocated for County Longford. The results of this assessment will be included within the Draft Plan along with a new policy objective. Based on a total land area for the County which equates to 1,091km² (1.6% of the state area of Republic Ireland 70,273km²); the 4GW national target would equate to 1.6% from the above to 64 Megawatts.”

It is our view that the inclusion of this text conflicts with the inclusion of Proposed Amendment CH 16.14 which refers to working with the Eastern Midlands Regional Authority to identify Strategic Energy Zones.

While we acknowledge that Longford County Council is only responsible for its own functional area, and that the new County Development Plan and proposed Renewable Energy Strategy will only extend as far as the Longford County boundary, it is our view that the spatial planning of renewable energy developments should take place on a regional level. This is highlighted in the National Planning Framework (Project Ireland 2040) and in the Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031 which states the following in RPO 7.35 on decarbonising the Energy Sector:

“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.”

Section 5.8: Renewable Energy - Proposed Amendment CH 5.33

Bord na Móna welcomes the additional wording (in red) included in Policy Objective CPO 5.129 to include a Wind Energy Strategy as part of the preparation of a Renewable Energy Strategy for the County as follows.

*“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. **The Strategy will include a Wind Energy Strategy for the County.**”*

Aside from our comments above with respect to the spatial planning of renewable energy developments on a regional level, we are concerned, as outlined in our earlier submission on the Draft County Development Plan, that the Map referenced in Policy CPO 5.137 and included in Appendix 2 (of Draft CPD outlining ‘Areas of Wind Farm Potential’ in the county 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. 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. 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.

Chapter 16: Development Management

Section 16.4.17: Renewable Energy Developments - Proposed Amendment CH 16.14

We welcome inclusion of the following text in Section 16.4.17 of the Draft Plan:

“The Council recognises the importance of Renewable Energy and its potential in contributing to the reductions in fossil fuel dependency and greenhouse gas emissions. EMRA will be working with the Council and other County Councils in the region to identify potential Strategic Energy Zones. In addition, during the lifetime of the Draft Plan the Council will produce a Renewable Energy Strategy (Including a Wind Energy Strategy) for the County.”

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. Designating strategic energy zones on a regional basis will ensure that a single, consistent methodology can be used across an entire region, including across county and local authority boundary areas to ensure that the 70% target can be met. It would also ensure that the optimum locations for wind energy development are identified, and every county’s potential is assessed in a regional and national context, in direct comparison with the rest of the region.

Such an approach is considered vital if the transition to a low carbon economy in the coming years is to be successful and to ensure that a consistent approach is used across the entire country that reflects Government policy.

It is also noteworthy that rural areas have significantly contributed to the energy needs of the country to date and should be allowed to continue to do so. Project Ireland 2040 acknowledges the contribution that rural communities have made to our energy landscape and with regard to future energy development states that:

“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment and respecting the needs of people who live in rural areas.”

It is our view that planning has an important role to play in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.