

Forward Planning Team,
Planning Department,
Laois County Council,
Áras an Chontae,
Fintan Lawler Avenue,
Portlaoise,
Co Laois.

02nd March 2020

Re: Laois County Council Development Plan 2021 – 2027: Bord na Móna submission in response to the Public Consultation Issues Paper.

Dear Sir/Madam,

Since its foundation Bord na Móna has been part of the socio-economic and cultural fabric of County Laois. 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 3,000 hectares.

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. The impact this transition is having on the communities which we support, and the wider economy and social fabric of Laois 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 Laois.

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 aquaculture and more still which we have yet to even identify. In framing your 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 20km 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 in time for you to take it into consideration as part of the development of the draft County Development Plan.

The public consultation issues paper invites submissions across a broad range of important topics. Given Bord na Móna's significant geographic, economic and social reach within the County 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 natural heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

Climate Action and Energy

The scale of the climate change challenge and the need for decisive, positive action to mitigate climate change is reflected in the Government's decision to declare a climate emergency in May 2019, followed by the publication of the Government's Climate Action Plan in June 2019. The ambition behind the plan is to:

... deliver a step-change in our emissions performance over the coming decade, so that we will not only meet our EU targets for 2030, but will also be well placed to meet our mid-century decarbonisation objectives. This Plan [the Climate Action Plan,] underpins this ambition by setting out clear 2030 targets for each sector and the expected emissions savings that will result.¹

Central to the Government's plan is the acceleration of the transition to renewable electricity generation with an overall target of achieving 70% renewable electricity by 2030. Achieving this will involve:

...phasing out coal- and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow

¹ *Climate Action Plan*, 2019 at page 12

between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.²

Specifically, the Government are targeting increased electricity generated from renewable sources indicatively comprising:

at least 3.5 GW of offshore renewable energy

up to 1.5 GW of grid-scale solar energy

up to 8.2 GW of onshore wind capacity³

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*”.

The potential for utilising the extensive Bord na Móna landholding in the midlands region to support renewable energy generation is specifically called out in the National Planning Framework:

Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy.⁴

Bord na Móna recognise this potential and have worked and continue to work to harness this potential: we have developed Mounthlucas wind farm in Offaly, Bruckana wind farm, part of which is in County Laois and Oweninny Phase 1 in Mayo. We have secured planning permission to develop a 63 MW wind farm at Cloncreen County Offaly and are planning to develop other projects including a 96 MW windfarm at Derryadd in County Longford as well as an 84 MW wind farm on Clongawny and Drinagh bogs (Derrinlough Wind Farm) in West Offaly and a 70 MW solar farm in Timahoe, County Kildare. There remains significant potential to develop renewable energy projects on our remaining land assets. In all we are advancing plans which could ultimately deliver as much as 1 Giga Watt of additional renewable generation across our estate.

As outlined previously, there are circa. 3,000ha of Bord na Móna lands within County Laois. These lands have the potential to make a significant contribution to meeting national and regional policy objectives across a range of sectors. Recently, Bord na Móna applied to Laois County Council for planning permission to develop a renewable gas facility at Cúil na Móna Bog, Portlaoise which is located off Junction 18 of the M7 motorway. The proposed facility is designed to treat 80,000 tonnes per annum of biodegradable and organic waste material through an anaerobic digestion process to produce a renewable gas for injection into the local natural gas network.

This proposed development is aligned with and will significantly contribute to achieving the targets and objectives set out in National and Regional policy by contributing to the development of a low carbon

² *Climate Action Plan, 2019* at page 53

³ *Climate Action Plan, 2019* at page 53

⁴ *Project Ireland 2040* at page 35

economy, achievement of renewable energy targets and the provision of much needed waste treatment capacity for the management of biodegradable waste.

There also remains potential to develop other activities on these lands and it is our view that the County Development Plan should consider all beneficial uses of Peatlands including energy, commercial, social and environmental.

The role of appropriate peatland management in furthering and achieving climate change mitigation targets is also recognised in the Climate Action Plan as follows:

Peatlands represent 64% of our total soil organic carbon stock, representing the largest store of carbon in the Irish landscape. This store is very vulnerable, especially to drainage for forestry, grazing and extraction. We will develop and better manage our carbon sinks with the following measures:

- *Restore/rewet all raised bogs designated as Special Areas of Conservation and Natural Heritage Areas... Such restoration measures and hydrological management of our protected peatlands will halt and reduce peat oxidation and carbon loss*
- *Undertake further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy.⁵*

Given the company's commitment to decarbonisation and the hastening of the cessation of industrial peat extraction for energy production, there exists an opportunity to accelerate our rehabilitation programme. In addition, more of our estate will be "cut-over" as opposed to "cut-away" with greater depths of residual peat and so affording opportunities to achieve more climate action and biodiversity objectives with our rehabilitation programme. With this objective in mind, we are currently developing plans to significantly accelerate and enhance our rehabilitation programme. Ultimately the vast majority of our former industrial cutover peatlands will be rewet and otherwise rehabilitated with the objective of supporting the re-establishment of thriving peatland environments with associated carbon mitigation and sequestration potential. This will support the main carbon mitigation land use objectives of the National Climate Action Plan.

Infrastructure and 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, because of 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.

In addition, the company's existing network of workshops and production facilities hold opportunities for the re-purposing 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 may exist for more of our facilities as we exit peat extraction.

⁵ *Climate Action Plan, 2019 at page 106*

In County Laois, the extensive industrial site, locally known as the Cúil Na Móna works site, has been in use for many years as a horticultural peat processing plant. The scale of this site, extending to c.20 acres, and its current buildings, totalling over 80,000 square feet, represent a significant opportunity for redevelopment and future industrial uses. This site, which is located at Junction 17 off the M7 motorway, is particularly close to the new Togher Business Park located at junction 17 and would enhance the overall viability of the region. In this regard, consideration should be given to the future industrial and commercial opportunities presented by this site in any review of the Laois County Development Plan.

The Laois County Development Plan should acknowledge this potential and 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 plans for Derryadd and Derrinlough Wind Farms.

Natural Assets & Green Infrastructure

Located within Ireland's Hidden Heartland the county is endowed with a rich natural landscape including 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.

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.

Examples of Bord na Móna enabled green infrastructure in the county include the restored Abbeyleix bog, which is now leased to the local community, and who now manage it as a conservation project. The Abbeyleix bog is part of a Natural Walking Loop and is a very popular local walking route located in a natural landscape. Bord na Móna continues to play a role in the management of this site.

Bord na Móna also restored Knockahaw Bog (Errill Bog) in 2018 as part of its Biodiversity Action Plan and peatland rehabilitation commitments. This site is located in south west Laois and Knockahaw Bog is partially located in Tipperary. Knockahaw Bog is a relatively large restored raised bog (312 ha high bog) located on the SE range of raised bog distribution in Ireland and will make a significant contribution towards Ireland's biodiversity objectives and commitments towards the conservation of raised bog habitat. Both Abbeyleix Bog and Knockahaw Bog are examples of high value biodiversity sites where Bord na Móna have made the decision to conserve and manage these sites for their biodiversity value and other ecosystem services. Other activities, such as amenity, are compatible with this primary objective. Peatland rehabilitation will also bring additional benefits of improving water quality and flood attenuation to downstream water-courses.

Future Bord na Móna land-use strategies and future Bord na Móna commercial development will support the Laois County Development Plan in the development of green infrastructure.

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 Laois 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,

Stuart Conaty
Land and Property Development Manager
Bord na Móna Plc.