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## **RE: REVIEW OF COUNTY DEVELOPMENT PLAN**

A Chara,

### **1.0 Introduction**

Coillte welcomes the opportunity to make this submission to Laois County Council (LCC) in response to the publication of the Laois County Development Plan 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.

Coillte has approximately 900 employees across Ireland and the UK, and comprises three discrete businesses, Land Solutions, Forest and Medite Smartply (Panels).

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.

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

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).

Coillte has established a new not-for-profit entity, Coillte Nature, through which the company is seeking to deliver significant impact on climate and biodiversity objectives by undertaking large discrete projects with a separate non-commercial focus. These projects are intended to increase the national forest estate but with a strong emphasis on climate change mitigation, native species and habitat quality, as well as the development of outdoor recreational amenities.

## **2.0 Coillte Land Solutions**

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Laois 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 Laois County Council to facilitate the development of a wide range of recreational, community and sporting facilities, ranging from playing pitches and clubhouses to walking trails, running tracks, all within easy reach of local communities.

Coillte is also Ireland's leading provider of outdoor recreational activities nationally, with over 3,000km of hiking trails, 12 forest parks, and 260 recreational sites, including those located in County Laois. Every year it is estimated there are over 18 million visits to our forests nationwide for outdoor recreation activities.

Coillte is also particularly proud to have helped deliver significant recreational developments to the Mid and Eastern Region including Center Parcs in 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 €30 million per annum to the local economy.

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

Investment in outdoor recreation and forest based activities also drives economic activity, supporting job creation and sustaining local communities. Located at some of the most scenic locations in County Laois, including locations adjacent to the walking and mountain bike trails, the Coillte estate is in a strong position to play a key role in developing “increased dwell time” tourism and recreation throughout the county. The nature of the Coillte estate encourages visitors to “play and stay”, whilst also capitalising on the potential of Ireland’s Ancient East without compromising the scenic landscape or rich heritage.

With respect to the Laois Tourism Strategic Plan 2018 – 2023 which identifies strategic tourism goals to ensure the county is successful in realising its tourism potential; Coillte has a significant role to play in promoting activity in nature and growing key projects, which foster tourism connectivity at accessible locations in the county. These projects include thematic experiences and developing new (tourist) accommodation. Coillte considers it vitally important therefore, that the Development Plan includes clear objectives to deliver on these priority areas and welcomes future opportunities to work with Laois County Council and other stakeholders to deliver same.

Coillte can also provide appropriate locations to facilitate the upgrade of water and wastewater treatment infrastructure, in consultation with Irish Water and Laois County Council, in order to ensure that local infrastructure needs are provided at a strategic level.

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 Laois County Council to identify and develop suitable lands that address local needs and to ensure the necessary infrastructure services and supports are in place.

### **3.0 Renewable Energy**

As mentioned above Coillte is one of the biggest developers of renewable energy in the State and has enabled in excess of 30% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer.

### **3.1 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 12 million tonnes of CO<sub>2</sub> equivalent emissions in 2017, 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 CO<sub>2</sub> 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 CO<sub>2</sub> reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

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.

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 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.

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 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.”*

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 Region<sup>1</sup>.

Coillte believes that this approach would ensure inter county consistency in relation to designating renewable energy zones and identifying landscape sensitivities.

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/updating 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 Laois 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

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<sup>1</sup> It should be noted that the DCCAE 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.

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

This methodology was used very successfully by Tipperary Co. Co. in devising their RES and was endorsed by the planning profession in 2018 at the Irish Planning Institute awards. This supersedes the step by step approach to identifying wind energy zones in the 2006 WEGs, which have been transposed into the 2019 Draft document<sup>2</sup>.

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*

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<sup>22</sup> Coillte made an observation in relation to this as part of the consultation on the Draft 2019 WEGs.

*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 Laois CDP.

The Draft Wind Energy Development Guidelines 2019 were also published last December by the Department of Housing, Planning and Local Government. These are likely to be finalised later this year. Specific Planning Policy Requirement (SPPR) 1 requires compliance with Section 3.4 which in turn says the Development Plan should set out the following: *“the identification on development plan maps of the key areas within the planning authority’s functions area where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged.”* As SPPR1 is proposed to be a binding requirement of the Wind Energy Development Guidelines, it essentially requires the preparation of a Wind Energy Strategy. There is an obvious opportunity to incorporate this as part of the current County Development Plan review process.

Coillte is an active member of the Irish Wind Energy Association (IWEA) and our staff actively participate in a number of the Association’s committees. In particular Coillte wish to support and endorse the recommendations proposed by IWEA in its separate submission. In this regard we note and wish to emphasis the following key issue:

The draft County Development Plan should bring forward progressive policies and objectives that ensure Laois County Council can deliver its share of the national climate change and renewable energy targets intended to decarbonise the Irish economy in line with the National Planning Framework and Climate Action Plan. Laois County Council must be confident its policies and objectives will be able to deliver on these national targets. Coillte looks forward to seeing the SEA use an evidence-based approach to confirm that the policies and objectives of the draft County Development Plan are sufficient to comply with Laois County Council obligations and will help facilitate projects that will further decarbonise the Irish economy over the lifetime of the new plan.

### **3.2 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 Laois 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.

### **3.3 Building Materials**

With respect to 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 Laois County Council promote the use of sustainable timber products wherever possible in building and construction projects.

### **4.0 Coillte Nature**

A healthy biodiversity and a stable climate are prerequisites for a thriving society and a strong economy, and nature has intrinsic value in and of itself. As Ireland's largest landowner, Coillte has a unique responsibility to deliver solutions that help restore nature and improve the integrity of our life support systems.

In June 2019, and with the next 30 years in mind, Coillte acknowledged this by announcing the establishment of Coillte Nature: a new non-profit division of the organisation dedicated to large-scale projects that advance the creation, restoration, reconnection and rehabilitation of woodland habitats across the country (as referenced in Section 1.0).

In January 2020, the team commenced work across its four strategic themes: native woodland creation, urban forests, major biodiversity projects and ecosystem services. Coillte Nature's first year of operation will see new collaborations, partnerships and projects rolled out under these themes, all with the common objective of wilder woods for Ireland.

### **5.0 Conclusion**

We believe that Coillte Land Solutions and Renewable Energy businesses have the experience and expertise to support Laois County Council and the Eastern and Midlands Regional Assembly to realise one 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.”*

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

- To ensure the zoning of sufficient lands for recreational, commercial, residential and tourism and industrial uses and associated objectives to support:
  - the development of tourism facilities (projects and accommodation) in collaboration with Coillte and relevant stakeholders, which will support the growth of connected and accessible tourism industry in the county; and
  - the provision of water and wastewater infrastructure (in collaboration with relevant stakeholders) within the county.
- 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 in identifying suitable lands.
- 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 and tourism in the county and make adequate provisions and objectives to facilitate their delivery.
- 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.

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