

Thursday 10th September 2020

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RE: REVIEW OF GALWAY COUNTY DEVELOPMENT PLAN

A Chara,

1.0 Introduction

Coillte welcomes the opportunity to make this submission to Galway County Council in response to the publication of the *Galway County Development Plan 2022-2028 Issues Paper*, published on 18th June 2020.

This section provides a summary of the Coillte group and thereafter sets out commentary on the Issues Paper. It is requested that the Council has regard to this submission, in the preparation of the draft *Galway County Development Plan 2022-2028*.

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 (including telecoms and wind energy), to environmental services.

Coillte has approximately 900 employees across Ireland and the UK, and comprises four discrete businesses; Forestry, Land Solutions, Renewable Energy and Medite Smartply (Panels).

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The forest sector provides around 12,000 jobs today, mostly in rural Ireland. Coillte's **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.

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 Galway. Every year it is estimated that there are over 18 million visits to our forests nationwide for outdoor recreation activities.

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). The Renewable Energy business also has a very high level of ambition in terms of delivery of new wind energy infrastructure in the period to 2030 and beyond.

In June 2019, Coillte established a new not-for-profit entity, **Coillte Nature**, which is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland. Coillte Nature is seeking to deliver significant impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:

- 1) Reforesting by planting new native woodland
- 2) Restoration of important biodiversity habitats
- 3) Regeneration of urban forests
- 4) Rehabilitation of critical ecosystem services

In January 2020, the team commenced work across a number of priority projects such as the Dublin Mountains Makeover, the Midlands Native Woodland Project and Restoring Hazelwood Forest Project. Coillte Nature will continue to seek new collaborations, partnerships and projects rolled out under these themes, all with the common objective of wilder woods for Ireland.

2.0 Submission to Galway County Council on the Galway County Development Plan 2022-2028 - Issues Paper

2.1 Tourism / Recreation and Community

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Galway 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 continue to work with communities and Galway County Council to facilitate the development of a wide range of accessible recreational, community and sporting facilities, ranging from playing pitches, clubhouses to walking and bike trails.

Coillte is particularly proud to have helped deliver significant recreational developments 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.

The Issues Paper identifies tourism as a key sector for the local economy, with the successful development to date of tourism infrastructure in areas promoted by Fáilte Ireland's Wild Atlantic Way tourism strategy, such as Galway city, Connemara and the Islands; establishing a recreation and amenity base associated with a wide range of natural and heritage assets in this part of the county.

The Issues Paper identifies the potential to further grow the tourism sector within the eastern part of the county, including within areas which form part of Fáilte Ireland's Hidden Heartland tourism strategy, relating to the waterway / lakeside setting, which offers unique tourism / recreation opportunities, in a highly accessible part of the country, to both domestic and international markets.

Located at a range of scenic locations in the county, the Coillte estate is in a strong position to play a key role in supporting the provision of new tourism and recreation uses, including thematic tourism / recreational projects at appropriate locations throughout the county. It is considered that investment in outdoor recreation and forest-based activities drives economic activity, supporting job creation and sustaining local communities.

Coillte has an open forest policy and welcome all visitors to our forests according to the principles of Leave No Trace. Coillte will continue to protect and enhance the walking and cycling trails within the Coillte estate,

including those at Aghrane, Árd na Gaoithe, Clonbur Wood, Lackavrea, Monivea, Mountbellew, New Village and Portumna Forest Parks, in full collaboration with Galway County Council and relevant stakeholders in the county.

It is considered that growth of the tourism sector, particularly relating to active recreation, would be supported by an increase in the quantum and variety of tourism accommodation. The nature of the Coillte estate can facilitate the provision of appropriate tourism accommodation at suitable locations throughout the county, including at Portumna, with full regard to the unique lakeside setting in the eastern part of the county; supporting the development of Portumna Forest Park “*as an amenity with significant growth potential*”, as identified in the *Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032*. Coillte looks forward to working in partnership with the Council and stakeholders in this regard.

Coillte supports the continued inclusion of policies in the forthcoming Galway County Development Plan (and Portumna Local Area Plan), which support the provision of tourism infrastructure, including the provision of tourism accommodation at suitable locations within the Coillte estate.

2.2 Infrastructure and Development

Coillte supports the development of green infrastructure resources as referenced in the Issues Paper and welcomes the opportunity to work in consultation with the Council to further develop this infrastructure, where appropriate within the Coillte estate.

Coillte can also provide appropriate locations to facilitate the upgrade of infrastructure and services necessary to deliver the economic development of the county, for example sustainable water and wastewater infrastructure, telecommunications or transport infrastructure. Coillte is committed to working with Galway County Council and other stakeholders to identify and develop suitable lands that address local needs and to ensure the necessary infrastructure services and supports are in place.

The Issues Paper identifies the need to accommodate population and employment growth within town and village centres of the Settlement Hierarchy, in accordance with the provisions of the *National Planning Framework (2018)* and the *Northern and Western Regional Assembly Regional Spatial & Economic Strategy (RSES), 2020-2032*.

The Coillte estate includes lands which are within close proximity to town and village centres including, for example those at Portumna, Clarinbridge and Mountbellew; as well as at Moycullen, where development has been permitted for residential use. It is considered that these lands could also provide for and accommodate

some alternative uses which would positively contribute to the sustainable development of the county, supporting and enabling national, regional and local policy objectives.

In this regard, the Council is requested to consider the provision of planning policies / land use zoning objectives where appropriate, to support the provision of infrastructure / development on Coillte lands where suitable; to provide, for example, tourism, commercial, community and residential and/or other uses which would support and enable national, regional and local policy objectives.

2.3 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 presently operating wind farms through wayleaves/rights of way and as a land supplier and developer. It is also targeting the delivery of 1GW of new onshore wind projects enabled by Coillte lands in the period to 2030. Subject to receipt of necessary regulatory approval, the Renewable Energy business unit will transfer to a newly formed joint venture company later in 2020, co-owned on a 50:50 basis by Coillte and ESB.

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 CO₂ equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words a massive reduction of 7.5 million 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).

The 2019 CAP provides the roadmap of what must be achieved requiring 70% of all our electricity to come from renewable energy sources by 2030. This almost doubles the present day target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW from offshore wind and a doubling of existing onshore wind generation from circa 4GW (today) to 8.2GW by 2030. It is critically important that the national

target and any updates thereof are specifically referenced in the new County Development Plan for County Galway. It is important that this reliable, nationally secure and established source of renewable energy continues to be promoted and facilitated in the new Plan.

To put the scale of the ambition set out in the CAP 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.

The new programme for Government (June 2020) further commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. The 2050 target will be set in law by the Climate Action Bill which will be introduced in the Dáil within the first 100 days of government alongside a newly established Climate Action Council. Every sector must contribute to meeting this target by implementing policy changes set out in the new programme.

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/ opportunities, and community and other interests.

In this regard Coillte highly commends the Council for commissioning the preparation of a Renewable Energy Strategy which, according to the Issues Paper, will form part of the new County Development Plan and will provide details on the various renewable energy options available and identify the most suitable locations for renewable energy.

Northern and Western Regional Spatial and Economic Strategy & a Regional Approach to Renewable Energy Strategies

The Northern and Western Regional Spatial and Economic Strategy (RSES) clearly recognises the urgent need to transition to renewable energy. RPO 4.16 of the RSES states:

"The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections"

Coillte strongly supports the development of a regional Renewable Energy Strategy to complement the local authority approach, which would co-ordinate the identification of sites of scale and ensure inter county consistency in relation to designating renewable energy zones and identifying landscape sensitivities.

Furthermore there does not appear to be any central guidance on the quantum (MW or GW) of new renewable energy development each local authority needs to make provision for. A regional approach could provide that context.

However, notwithstanding our strong belief in a holistic Regional Renewable Energy Strategy, Coillte recognises that time is of the essence. With this in mind and as stated above Coillte commends the Council for commencing the preparation of a RES and incorporating this as part of the making of its new County Development Plan.

In preparing its RES, Coillte suggests Galway County Council engages closely with neighbouring and other local authorities in the Northern and Western region to strive to attain the same important benefits and synergies that RPO4.16 would achieve. A regional steering group comprising planners from each local authority and potentially led by Galway planners and/or the NWRA, would be optimum. A representative from the DHPLG could 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 we welcome the Council’s proposal to use same. [<https://www.seai.ie/publications/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf>]. This enhances the step by step approach to identifying wind energy zones in the 2006 WEGs, which have been transposed into the 2019 Draft document¹.

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

- Each local authority ensures a proportionate contribution by the county to the achievement of new national targets. This could be done in a holistic manner via the Steering Group (referred to earlier). Regardless the individual County Development Plan’s Strategic Environmental Assessment should use an evidence-based approach to confirm that the proposed contribution is sufficient to comply with each local authority’s obligations in this regard. The level of contribution (ambition) will then dictate the criteria used in identifying lands for renewable energy.

¹Coillte made an observation in relation to this as part of the consultation on the Draft 2019 WEGs.

- Each local authority carries out a full assessment of all lands within their county and classifies areas for renewables using terminology which is agreed in advance with the Steering group. Such terminology could include: 'No-Go', 'Open to Consideration', and 'Preferred' areas. It should be noted that the associated quantum of land identified as potentially suitable for renewable energy development must go beyond the actual amount required to be built in order to allow for a natural attrition rate across development sites, including for example landowners not choosing to develop, or site level constraints arising at the detailed survey and design stage.
- 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 is likely it will be necessary to extend current areas suitable for renewables into slightly more sensitive landscape areas in order to deliver on the requirements of the CAP. However this can still be done while protecting national, regional and locally important landscapes, particularly if a regional / steering group approach is adopted.

It should be noted that wind turbine technologies have advanced significantly in the recent years 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 constraint when identifying suitable areas for onshore 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 future grid development/reinforcement by the System Operator, 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 Northern and Western RSES has excellent policies in relation to grid development and Coillte requests that these are mirrored in the Galway CDP.

The Draft Wind Energy Development Guidelines 2019 were also published last December by the Department of Housing, Planning and Local Government. Coillte requests that the Galway County Development Plan

recognises the Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.

Renewable Energy and Economic Growth

The Energy Sector is a key sector for economic growth, throughout the lifetime of the next CDP. Wind Energy development is clean, green and has the ability to generate significant construction and operation jobs throughout its lifetime and to contribute to communities through community benefit funds and to the local authority through rates.

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. IWEA statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to Local Authorities. Combined, these amount to approximately €25,000 per MW per annum.

Therefore, wind energy is of strategic importance to the county both in addressing Climate Change and in growing the economy of Galway and providing employment opportunities.

Infinite Lifespan of Wind Farm Planning Permissions

Coillte also wishes to bring the Council's attention to IWEA's paper on 'Infinite Lifespan of Wind Farm Planning Permissions', (available at <https://iwea.com/images/files/final-paper-on-infinite-planning-duration.pdf>) and the fact that the majority of developments that obtain planning permission in Ireland are afforded a planning permission of infinite duration. However, it has been common-place in Ireland for the life of a wind farm to be restricted by a condition of the planning permission despite their being no policy basis.

Removing such conditions would enable wind farms to continue producing clean energy at a very low cost to the consumer, for as long as possible and continue to contribute via rates to local authorities. Wind energy is set to play a crucial role in helping Ireland to achieve its climate change targets and should not be treated as a temporary solution. Making this relatively minor amendment would save at least €1 billion for consumers under RESS alone while delivering the 70% renewable electricity target for 2030.

Currently, in order to continue operation beyond these limits, the wind farm operator would need to apply for planning permission for life extension (retaining existing turbines for a limited extended period) or for

repowering (replacing older turbines with newer ones). This can be a costly and time-consuming process and it can be challenging to create a business case when seeking simply to extend the life of existing turbines for a limited number of years.

Notwithstanding the above, Coillte and IWEA recognise the importance of having decommissioning provisions in place for a wind farm when it does reach the end of its life. At a certain point it will no longer be viable to operate the wind farm, and in such cases, when the wind farm is no longer generating and exporting electricity to the grid, it should be decommissioned, and the turbines removed. To ensure that this is carried out in the correct manner, and that funds are allocated to cover these works; it is common for a wind farm planning permission to contain conditions that ensure that prior to construction the developer must submit a comprehensive decommissioning plan (which must be approved by the local authority) and a decommissioning bond to cover the cost of the proposed decommissioning works, which could be triggered once the project has stopped exporting electricity to the grid. This provides the local authority with comfort that once the wind farm ceases operations, it will be properly decommissioned.

Working in Partnership on Wind Projects

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 associated recreational facilities and we are available to work in partnership with the 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.

In relation to communities Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit (circa €30k per annum per turbine for a 5 MW turbine; therefore exceeding €200k per annum in projects which are now typically exceeding 35MW in nameplate size), providing an opportunity to transform rural communities where projects are located. Community funds are run by the host community and we would be happy to take feedback from the local authority as to how these funds can be most impactful. 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.

2.4 Sustainable Timber Products

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 Galway County Council promote the use of sustainable timber products in the forthcoming County Development Plan.

3.0 Conclusions

Coillte welcomes the opportunity to make this submission to Galway County Council with respect to the making of the draft *Galway County Development Plan 2022-2028*. Coillte has engaged positively with Galway County Council throughout the years and wishes to continue this important collaboration.

In preparing the draft County Development Plan, Coillte requests that the Council:

- 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.
- Ensure the zoning of sufficient lands with associated objectives for recreational, commercial, tourism, residential and community uses.
- Support the provision of accessible recreational, community and sporting facilities in the county.
- Support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate.
- Support the provision of residential and community based uses at appropriate locations within the county.
- Support the provision of infrastructure and services at appropriate locations within the county.
- Promote the use of sustainable timber products in the Development Plan policies and objectives.

With respect to renewable energy, we believe that Coillte Forestry, Land Solutions and Renewable Energy businesses and Coillte Nature have the experience and expertise to support Galway County Council and the Northern and Western Regional Assembly to realise the Region's key principles around climate action.

In this regard, the following are key asks of the local authority in the preparation of the Galway County Development Plan with respect to renewable energy:

- Include policies and objectives in the Plan that recognise, promote and facilitate onshore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the targets set out in the Climate Action Plan and objectives of the recent programme for Government.

- Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by incorporating a Renewable Energy Strategy for the county (as proposed) based on the most up to date national targets and the principles of the SEAI LARES.
- Lead the Northern and Western 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, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands, and ensure a sufficient quantum is identified to account for site level attrition.
- Reconsider the attachment of conditions of finite duration to wind farm permissions.
- Recognise the DHPLG Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.
- Work in partnership with other government agencies and third parties, including the public, to achieve these goals.

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

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