

Forward Planning Department,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
Co. Offaly.

26th September 2019

Re: Offaly County Council Development Plan 2021 – 2027: Submission in response to 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 Offaly. 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 over 27,000 hectares: representing over one eighth of the entire functional area and one third 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. The impact this transition is having on the communities which we support, and the wider economy and social fabric of Offaly 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 Offaly.

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 our 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 our peatland.

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 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.

Your public consultation issues paper invites submission 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 biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

Climate Action and Energy

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[ing]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.*¹

Bord na Móna's recognise this potential and have worked and continue to work to harness this potential: we have developed Mountlucas wind farm, secured planning permission to develop another at Cloncreen and are planning to develop another project in West Offaly on Clongawny and Drinagh bogs

¹ *Project Ireland 2040* at page 35

(Derrinlough Wind Farm). There also remains potential to develop projects on our remaining lands in Offaly.

In addition to the potential for Wind and Solar renewable energy development and deployment, the county is uniquely positioned in relation to the production of renewable energy from biomass. At present, Offaly is home to the Edenderry Power Plant which is the largest dispatchable renewable electricity² source on the island of Ireland. As well as providing dispatchable electricity to meet system demand, the physical characteristic of the generation set in Edenderry Power Plant also contributes to ancillary system services (AS) which are necessary for the safe and secure operation of the national grid.

Government policy has and continues to recognise the role of biomass in power generation. The current REFIT support scheme for biomass, which runs until 2030, at Edenderry and the other Midlands stations was approved by the European Commission in 2011. Renewable energy from biomass is a very important element in meeting Ireland's renewable energy targets, and as such the County Development Plan should expressly promote renewable energy from biomass at Edenderry and West Offaly stations, as they transition from peat. In addition, the proposed development plan must also accommodate the development and installation of the required ancillary infrastructure that will be necessary to develop and expand a sustainable biomass industry and supply chain in the county.

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, 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. The County Development Plan should acknowledge and support this potential.

Tourism continues to grow in the county and has the potential to contribute significantly to the future economic development of the county. Bord na Móna owns and operates the county's top visitor attraction, Lough Boora Discovery Park, with in excess of 100,000 visitors per annum. This unique attraction provides a blend of amenity, natural beauty, education and cultural points of interest. The support of Offaly County Council in the development of this amenity and in particular the sculpture park is acknowledged and greatly appreciated. Opportunities exist to enhance the visitor experience at the park to ensure the retention and promote the expansion of visitor numbers; this together with initiatives to improve connectivity with neighbouring communities and facilities and indeed the wider county through the development and extension of greenways and other infrastructure.

In this regard, our network of bogs and the industrial railway provides opportunities for the creation new amenity corridors across the county. For example, Lough Boora Discovery Park is already linked at Derries Bog and Turraun Bog to the Grand Canal. Another example under development can be found in the Cloncreen wind farm amenity plan which proposed to provide a connection from the Grand Canal at Edenderry through Cloncreen, on through Ballycon wetland to Mountlucas wind farm and back to the canal near Daingean.

² i.e. it is a source of electricity that can be used or consumed (dispatched) at the instant it is needed.

Natural Assets & Green Infrastructure

As we transition away from commercial peat production and decarbonise our business the rehabilitate 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.

Bord na Móna have developed and made available to the public significant green infrastructure throughout the county and further future potential exists, the exemplar being Lough Boora Discovery Park. This park, which extends to almost 1,000 hectares, harmoniously integrates amenity, woodland/forestry, biodiversity and nature conservation and is enjoyed by in excess of 100,000 visitors each year. Other Bord na Móna enabled green infrastructure in the county include Derryounce wetland – leased to Portarlinton Community Development Association, and Killaun Bog, where a portion of the bog is leased to the local community.

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 Grand Canal and its associated habitats and the river Shannon. , other future BnM land-use strategies and future BnM commercial development will support the Offaly 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.

Supporting Rural & Urban Regeneration

Accessibility and connectivity to amenities is crucial. Cutaway peatlands as demonstrated at Lough Boora Discovery Park have enormous potential to provide quality recreational areas for both local and national users. As the amenity offer increases in these areas so will the traffic. In addition, 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. A balance needs to be struck which recognises the suitability of a particular site as a potential future amenity or 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.

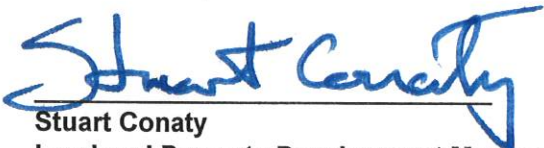
Bord na Móna are pioneers in the development of community benefit schemes providing significant funds for investment in catchment communities for rural, town and village regeneration supported by the commercial renewable energy developments such as Mountlucas in County Offaly.

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). If the Government target that sees 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 Offaly 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.