

Wednesday, 7<sup>th</sup> October 2020

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

Online submission via [https://www.offaly.ie/occ\\_mini\\_websites/CDP/](https://www.offaly.ie/occ_mini_websites/CDP/)

**RE: DRAFT OFFALY COUNTY DEVELOPMENT PLAN 2021 - 2027**

A Chara,

**1.0 Introduction**

Coillte welcomes the opportunity to make this submission to Offaly County Council in response to the publication of the draft *Offaly County Development Plan 2021-2027*, dated 27<sup>th</sup> July 2020.

This section provides a summary of the Coillte group and thereafter sets out commentary on the draft County Development Plan. It is requested that the Council has regard to this submission, in the preparation of the *Offaly County Development Plan 2021-2027*.

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 Offaly. 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 on-shore 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 see new collaborations, partnerships and projects rolled out under these themes, all with the common objective of wilder woods for Ireland.

## **2.0 Submission to Offaly County Council on the draft *Offaly County Development Plan 2021-2027***

### **2.1 Forestry, Tourism/Recreation and Community**

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Offaly 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 Offaly 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 mountain bike trails.

Coillte is proud to have helped deliver Tullamore Distillery, a new distillery with bonded warehouse in Tullamore, supporting the local economy, and associated whiskey tourism in the wider region.

Coillte is also 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.

#### **Forestry**

As noted above, Irish forestry today is a vibrant industry, and is set to double in size over the next ten years. Coillte is committed to managing its forest estate in a fully sustainable manner, supplying wood products to end users within the county, such as supplying logs for chipping to Edenderry Power. Coillte Forestry employs staff from within County Offaly, at both direct and contractor level, to the benefit of the local community and economy, and is committed to continuing to work proactively and collaboratively with the Council and other stakeholder groups within the county.

Coillte has an open forest policy and welcome all visitors to our forests according to the principles of Leave No Trace. Within County Offaly, Coillte has developed Forest Recreation Areas in Glenafally and Glenregan; recreational trails at Durrow Abbey, Garryhinch, Glasderry, Golden-Grove and Knockbarron Wood; and mountain bike trails in the Slieve Bloom Mountains, from Kinnitty village. The forests in Offaly are used by diverse groups including community groups and schools.

Coillte supports the inclusion of **Policy REDP-15** in the draft Plan, which seeks “to encourage state and private afforestation, both native broadleaf and coniferous species, in appropriate locations”; and we refer the Council to the range of projects undertaken nationally by Coillte Nature to date, as referenced above.

Coillte also welcomes the inclusion of **Policy REDP-07** in the draft Plan, supporting diversification from agriculture into other activities including forestry, rural tourism, renewable energy and the bio-economy, whilst protecting the natural landscape; and **Objective REDP-09** which seeks “to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism, and forestry enterprise” in recognition of the contribution that rural areas make to social and economic wellbeing.

### **Tourism/Recreation and Community**

The draft Plan identifies that the tourism sector “plays a role in economic development and enterprise activity” (Section 5.6.5 refers). It is considered that investment in outdoor recreation and forest based activities drives economic activity, supporting job creation and sustaining local communities. In this regard, Coillte fully supports the inclusion of policies and objectives in the draft *Offaly County Development Plan 2021-2027*, which facilitate tourism and recreation at a range of locations in the county (**TRO-10, TRO-15, TRP-22, TRP-16, TRP-18, TRP-20** refer).

Located at some of the most scenic locations in County Offaly, including the established walking/mountain bike trails and forest recreation areas referenced above, the Coillte estate is in a strong position to play a key role in supporting the provision of tourism and recreation uses throughout County Offaly.

The draft County Development Plan identifies the need for sensitive development of tourist accommodation within existing settlements and at appropriate locations within the rural areas of the county, supporting existing tourist facilities. It is considered that the provision of additional tourism accommodation at suitable locations, would support the growth of the tourism sector, having regard to the range of passive and active recreation facilities in the county; and Offaly forming part of *Ireland’s Ancient East* and *Ireland’s Hidden Heartlands* tourism strategies.

Further, the nature of the Coillte estate can facilitate the provision of forest-based tourism accommodation at a range of locations, while protecting the natural and built assets of the county. In this regard, Coillte fully supports the inclusion of policies and objectives in the draft *Offaly County Development Plan 2021-2027*, under which tourism infrastructure, including tourism accommodation, could be facilitated at appropriate locations in the Coillte estate (**TRP-06, TRP-07, TRO-02, TRO-03 20** refer). Coillte looks forward to working collaboratively with the Council and relevant stakeholders in this regard.

It is considered that the developing mountain bike trails has had a positive impact on Kinnitty village and environs to date, with a vibrant tourism hub emerging. In this regard, Coillte supports the inclusion of policies in the County Development Plan, which would further enhance the tourism function of Kinnitty village, including the provision/promotion of additional tourism infrastructure in the village, such as camp site accommodation. Coillte also supports the continued protection of the built heritage of Kinnitty village and environs, protecting key tourism assets which contribute significantly to the character and setting of this part of the county.

Coillte is committed to strengthening the relationship with Offaly County Council, to work proactively and collaboratively in the exploration of further recreation projects/facilities at appropriate locations within the Coillte estate.

### **Infrastructure and Development**

Coillte supports the identification of Tullamore as a Key Town in the Core Strategy of the draft *Offaly County Development Plan 2021-2027*, having regard to the provisions of the *Midland Regional Assembly Regional Spatial & Economic Strategy (RSES), 2030* and the *National Planning Framework (2018)*.

It is noted that further to the making of the *Offaly County Development Plan 2021-2027* the Council intend to prepare a Local Area Plan (LAP) for Tullamore. It is also an objective to examine the feasibility of providing a Western Bypass / Relief Road to the west of Tullamore Town (**Objective SMAO-09**). Coillte welcomes the completion of this feasibility study, and the preparation of the LAP for Tullamore given the status of the town within the Core Strategy.

The Coillte estate includes lands which are within close proximity to Tullamore. It is considered that further to this process, 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; and provide for the consolidated growth of the town.

## **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 on-shore 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.

### **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 Offaly and providing employment opportunities.

### **Draft Plan Policies and Objectives**

In terms of climate action and renewable energy, Coillte recognises and welcomes the numerous supportive policies in the Draft County Development Plan (CDP) and in particular CAEP-04, CAEP05, CAEP07 and CAEP08. In terms of the climate and energy policy publications referred to in CAEP-04; it should be noted that it has taken 20+ years to achieve the current level of renewable on-shore wind penetration onto the Grid. The challenge under the Climate Action Plan 2019 (referred to in the policy) is to achieve twice as much in half the time. This is a significant national objective that requires the Draft CDP to be fully cohesive across all proposed policies and objectives.

We also welcome renewable energy policies CAEP O21 – 25 inclusive. In terms of consultation, (CAEP-23), it should be noted that 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 terms of community benefit funds (CAEP-24) 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. In addition Coillte profits belong to the state and are returned by dividend to the shareholder on an annual basis.

In addition to the general policies in the Draft Plan, we commend the Council for updating its Wind Energy Strategy (WES). In particular we note the wind energy development policy in Section 8, which confirms that in areas not deemed suitable for wind energy, developments applications for re-powering and extension of existing and permitted wind farms “*will be assessed on a case by case basis*” and will be subject to the criteria in Standard 109 in Chapter 13 Vol. 1 and the Wind Energy Development Guidelines in force/place at the time. We concur that it is appropriate, in principle, to consider such applications following a detailed review of the site or proposed project, which may render a project suitable on a case by case basis. We also concur that it is important that this policy is mirrored in the main written statement of the Plan as has been done in objective CAEO-03(3). For consistency this would also be welcome as an expansion to CAEP-35 item (b) in the current Draft Plan, or as an extension to CAEP-36.

In relation to Standard 109 (Ref. DMS-109 Wind Farms, Section 13.9.13) we are concerned with the following two criteria proposed, namely:

- 1            *“2km separation distance from turbine to town and village boundaries in the county as required by policy CAEP-35 of this Plan” (Note: This is also a requirement in policy CAEP-35(c))*
  
- 2            *“Impact on human health in relation to noise disturbance (including consistency with the World Health Organisation’s 2018 Environmental Noise Guidelines for the European Region)...”*

In relation to the 2km separation distance Coillte is concerned about the introduction of a bespoke separation distance between turbines and centres of population in County Offaly. The basis for such a proposal does not appear to be evidenced based and has the potential to stymy on-shore wind in the County. This would be contrary to national and regional policies and other supporting policies in the Draft CDP as listed previously in this submission.

It should be noted in the Draft Wind Energy Development Guidelines (WEGs) 2019 that it is a specific planning policy requirement under Section 28(1C) of the *Planning and Development Act 2000*, as amended, that, in both their development planning and management functions, planning authorities shall not apply a setback distance that exceeds 4 times tip height of the relevant wind turbine and the nearest point of the curtilage of any residential property in the vicinity, subject to a mandatory minimum of 500 metres<sup>1</sup>. The proposed town and village setback has the potential to conflict with this requirement.

Coillte strongly recommends that the Council removes this reference in Standard 109 and in CAEP-35 in its entirety, and that all associated policies rely on and refer to setbacks in the DHPLG WEGs 2006 and any future amendment thereof. This will ensure that the Council does not build conflicting policies into its Plan and in particular a conflict between CAEP-35(a) and (c) in the current Draft. This should be rectified as a priority prior to adoption.

Coillte similarly questions the reference to the WHO 2018 Environmental Guidelines in Standard 109. Impact on human health in relation to noise disturbance is a critical consideration and must be a factor in every decision. However, this is a highly technical area and appropriate noise guidelines and standards for Ireland are a matter for national policy in the Wind Energy Development Guidelines. Once again including this text in the Plan has the potential to conflict with the WEGs and any update thereof when adopted. As above, this in turn has the potential to conflict with the Council's own policy CAEP-35(a). For this reason Coillte requests this reference is also removed.

We support CAEP-25 and the Council's policy to co-operate with the EMRA in identifying Strategic Energy Zones as areas suitable for larger energy generating projects, community and micro energy production, whilst ensuring environmental constraints and a regional landscape strategy are considered. 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. We believe that this approach would ensure inter county consistency in relation to designating renewable energy zones and identifying landscape sensitivities.

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<sup>1</sup> [https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft\\_revised\\_wind\\_energy\\_development\\_guidelines\\_december\\_2019.pdf](https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf)  
Draft WEGs 2019, Section 6.18.1



As mentioned previously in terms of the Climate Action Plan 2019, we are in a period of significant ambition for on-shore wind up to 2030 and beyond. To ensure a proportionate contribution by each county to the achievement of these national targets, we request the individual County Development Plan's Strategic Environmental Assessments use an evidence-based approach to confirm that the proposed designated land is sufficient to comply with each local authority's obligations in this regard.

### **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. 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 Climate Action Plan 2019 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.

### **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 Offaly 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 Offaly County Council with respect to the making of the draft *Offaly County Development Plan 2021-2027*. Coillte has engaged positively with Offaly County Council throughout the years and wishes to continue this important collaboration.

In preparing the draft County Development Plan, Coillte request 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 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 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 Offaly 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.*"

In this regard, the following are key asks of the Local Authority in the preparation of the final Offaly County Development Plan with respect to renewable energy:

- Work in partnership with other government agencies and third parties, including the public, to achieve these goals.
- Amend CAEP-35 and Development Management Standard 109 to remove references to a 2km setback from towns and villages and references to WHO Noise Guidelines 2018. Instead ensure that all policies rely on and refer to standards in the DHPLG WEGs 2006 and any future amendment thereof.
- Ensure a proportionate contribution by County Offaly to the achievement of on-shore wind energy targets in the Climate Action Plan and use the SEA tool to demonstrate this has been achieved.
- Reconsider the attachment of conditions of finite duration to wind farm permissions.

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

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