

Submission for the County Offaly Draft County Development Plan: Bord na Móna welcomes the opportunity to make a submission in relation to the Draft Offaly County Development Plan 2021 - 2027. Since its foundation Bord na Móna has been part of the socio-economic and cultural fabric of County Offaly. The company has contributed to economic development and employment in the County and in doing so supporting many communities. This is reflected in the geographic footprint the company occupies within the County which extends to in excess of 27,000 hectares. Attached is an area map of Bord na Móna lands in Offaly County. 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 biogas and more still which we have yet to even identify. In finalising the County Development Plan, it is important that we not close the door to the range of future commercial and job creation opportunities which may be supported by Bord na Móna's land and property assets within the county. In this context, it is important to reflect on the nature and uniqueness of this significant landholding. While somewhat fragmented in geographical spread, much of the company's estate is characterised by large tracts of land. This is a somewhat uncharacteristic feature in the context of Irish landholding and therefore offers unique opportunities for a multitude of uses not readily suited to smaller dispersed landholdings. This, coupled with proximity to the national electricity infrastructure and relative isolation from residential areas, is particularly suited to the development of renewable energy such as windfarms and solar farms and other large-scale energy dependant industrial development. Most of our peatland has been utilised for industrial peat extraction for decades and consequently much of the overlying peat deposits has been cutaway. As we exit peat extraction activities, this cutaway will be stabilised through the implementation of a rehabilitation programme with significant portions of these lands rewilding and supporting biodiversity and other ecosystem services. We believe that it is possible to successfully integrate this emerging biodiverse and amenity rich landscape with other commercial, industrial and employment generating

uses. This is exemplified in the transformation of our Mountlucas property in county Offaly which has changed from a site with a single use (peat harvesting) to one hosting a rich mosaic of complimentary activities. Over the last decade an 84MW windfarm has been developed on the site. The windfarm supplies over 50,000 homes with renewable electricity while providing a sustainable income which in turn supports significant local community investment. With the wind assets occupying a mere 5% of the 1,100 hectare site, this rehabilitated cutaway has helped significantly mitigate carbon emissions and also developed into a rich ecosystem with a range of different habitats for native plants and animal species. The site also provides a new significant public amenity with over 20km of walking/running/cycling tracks for people living in the local communities. In addition, the company has also developed a number of new business projects on the site including a closed loop re-circulation aquaculture facility and 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. The bogs of Bord na Móna are a land resource of national significance that offers a range of opportunities and options for new beneficial uses. It is clear that these lands have the potential to support national policy objectives across a range of sectors including rural development and employment, renewable energy, recreation and tourism, and biodiversity. We expect to publish a revision of the Strategic Framework in the coming months and it will be made available to stakeholders. The Draft Offaly County Development Plan invites submissions across a broad range of important topics and we believe Bord na Móna can make significant positive contribution across many of these areas. In particular, we believe we have a significant role to play in delivering on climate action & energy policy, supporting natural heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration. This submission will provide commentary on the proposed Draft Plan in addition to information on how Bord na Móna is working to support and endorse National, Regional and Local policy, objectives and targets. Chapter 3 - Climate Action & Energy Section 3.2: Renewable Energy While we welcome and concur with the content and many policies outlined in Chapter 3, which support renewables projects in County Offaly, we are concerned that, compared with the existing

plan, the synergy between renewable energy developments and the after use of cutaway peatland, is not recognised in Chapter 3. While we acknowledge the many references in other chapters to the potential that cutaway bogs offer for landuses that can enhance employment, renewable energy generation, tourism, biodiversity and green infrastructure, we feel that Chapter 3 should specifically call out their suitability for renewable energy projects. It is our view that the draft plan should be consistent with the National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Midlands Region which state the following with regard to the suitability of cutaway bogs for renewable energy generation in the Eastern and Midlands Region as follows: “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.” [National Planning Framework, Section 3.2, pg. 35] and “Local authorities should harness the potential of renewable energy in the Region 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”. [RSES, Section 7.9, pg 179] A significant portion of our landholding in Offaly has already been committed to renewable energy projects, most notably the operational Mountlucas Wind Farm and Cloncreen Wind Farm which is under construction. In addition, our proposal for Derrinlough Wind Farm (on Clongawny and Drinagh bogs in West Offaly) is currently with An Bord Pleanála for consideration and we recently launched our plan to develop a wind farm on Ballydermot Bog Group which will straddle the Offaly/Kildare border. Once consented Bord na Móna will also work towards getting these projects constructed in order to develop renewable generating assets. We believe that our cutaway bogs will continue to play an important role in the generation of renewable energy into the future and it is our intention to continue developing renewable energy projects on our bogs. Our goal is to be the largest producer of renewable electricity in Ireland. In that context, we would encourage Offaly County Council to recognise the importance that cutaway bogs have in terms of renewable energy generation. These lands are brownfield in nature, have limited environmental constraints and are largely removed from large numbers of sensitive receptors. They are also in close proximity to the national grid and have good road access. These factors make them prime sites for the development of

large scale integrated (In this sense, 'integrated' includes where appropriate a combination of complimentary generation technology (wind and solar for example), energy storage, electrical transmission/distribution infrastructure, potential onsite large volume off-takers (e.g. data centres)) renewable energy projects and associated developments and we feel that this should be reflected in the finalised County Development Plan in order to ensure consistency with the objectives and policies of existing National and Regional Plans. Section 3.2.6: Wind Energy Wind Energy Policy CAEP-35 states the following: "It is Council policy that in assessing planning applications for wind farms, the Council shall: (a) have regard to the Department of the Environment, Heritage and Local Government's Guidelines for Planning Authorities on Wind Energy Development (or any update of this document) including applying appropriate setback distances as identified in the Guidelines; (b) have regard to 'Areas Open for Consideration for Wind Energy Developments' in the Wind Energy Strategy Designations Map from the County Wind Energy Strategy; (c) require a 2 km separation distance from turbines to town and village settlement boundaries in the county; (d) have regard to Development Management Standard 109 on wind farms contained in Chapter 13 of this Plan; and (e) have regard to existing and future international, European, national and regional policy, directives and legislation." Bord na Móna strongly contends that item (c) should be removed from this policy for the following reasons:

- The buffer zones proposed are not in accordance with the existing Wind Energy Development Guidelines(2006) or the most recent updated draft guidelines.
- The draft county development plan does not define the size or population thresholds required for a settlement to be defined as a village or a town.
- The draft county development plan does not define 'core' of the proposed town or villages.
- Both the existing and draft guidelines examine the potential impact on individual dwellings and do not differentiate between rural and urban dwellings. This ensures that all residential dwellings are treated in a uniform way and are of equal importance with respect to wind energy development. For the same reasons, we also contend that the 2km buffer from turbines to town and village settlement boundaries should be removed from Design Management Standard 109 (Chapter 13 of the Draft Plan).

Section 3.7: Peatlands We note the references throughout the draft plan to the preparation of a comprehensive after use framework plan for the industrial peatlands, in particular the inclusion of Policy CAEP-13. Bord na Móna published its first long-term land use strategy, Strategic Framework for the Future use of Peatlands in 2011. 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. As outlined previously the Bord na Móna landholding is a land resource of national significance that offers a range of opportunities and options for new beneficial uses. It is clear that these lands have the potential to support national policy objectives across a range of sectors including rural development and employment, renewable energy, recreation and tourism, and biodiversity. We expect to publish a revision of the Strategic Framework in the coming months and it will be made available to stakeholders. Policy CAEP-14 states that “It is Council policy to investigate the potential for a Green Energy Hub on peatlands in the county and facilitate it if possible”. Bord na Móna support this policy and would like to make reference to the Learning Hub at the Mountlucas Wind Farm visitor centre, which contains a series of interactive hands-on activities based around wind energy and technology. This is an example of how other beneficial uses can be integrated successfully with wind energy developments. Section 3.13: Decarbonisation Actions and Projects Table 3.1 of the Draft CDP lists a number of actions and specific projects that can be undertaken in County Offaly to help achieve a low carbon climate resilient and environmentally sustainable economy. Many of these actions are very closely aligned with the objectives of the ‘Strategic Framework for the Future Use of Peatlands’ document and our ongoing transition to diversify into new sustainable business areas in order to strengthen the company and support jobs in the midlands into the future. Central to this sustainable transition is the use of our land bank for a range of beneficial commercial, environmental and social uses such as renewable energy, industrial uses (including but not limited to data centres), biomass cultivation, aquaculture, herb cultivation, ecosystem services and biodiversity as well as recreation and tourism. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located. As part of our peatland rehabilitation programme Bord na Móna will look to re-wet residual peat in our landbank and reduce carbon emissions. In time, there is potential to restore some carbon sinks in suitable conditions. In the past 3 years, Bord na Móna has carried out peatland rehabilitation and re-wetting on its bogs in Co. Offaly at Derrybrat, Derries, Cavemount, Mountlucas, Clonsast and Derryarkin. The work carried out at Mountlucas demonstrates that peatland rehabilitation can be carried out in conjunction with other developments. In addition to the existing programme, Bord na Móna is developing an Enhanced Rehabilitation Scheme with Government support that will look to optimise climate action benefits by developing suitable hydrological conditions for re-wetting and setting sites on a trajectory towards becoming naturally

functioning peatland ecosystems. Re-wetting to optimise climate action benefits can also be integrated and balanced with other land-uses such as renewable energy development. Wind Energy Strategy The National Climate Action Plan (CAP) 2019 has set out an ambitious 70% target for renewable energy production out to 2030. To meet this target, the amount of electricity generated from renewables will have to be doubled on current figures and on-shore wind will comprise the majority of these projects. Following review of both the draft WES and the current WES it is evident that there are proposed changes to the areas which have been deemed suitable for the provision of wind energy. With respect to Bord na Móna lands, it would appear that many of the changes have arisen due to proximity of sites to areas of high amenity, ecological and landscape sensitivities, proximity to settlements and other technical considerations although it is not clear from the document what particular features are being considered and whether any buffers/setbacks are being applied. The WES is a strategic document and at that level it is appropriate to apply high level assumptions. However, from our experience with developing wind energy projects on our bogs and the associated detailed environmental reports and assessments that are required, it is evident that often areas that have been identified at a high level as not being suitable for wind energy development would benefit at a site specific level from the same characteristics as an area considered suitable. This is also evident in the reverse. In this context, careful consideration needs to be given to the zoning of areas for renewable energy development going forward, so as not to constrain out any areas which may have renewable energy potential, particularly for wind generation. Such an approach will assist developers in bringing projects forward to contribute towards the 70% target for renewable energy production out to 2030. Section 5.1 of the Wind Energy Strategy (WES) addresses wind speeds and makes reference to the “current viable wind speed areas in County Offaly at a hub height of 100 metres above ground level based on the Sustainable Energy Authority of Ireland (SEAI) Wind Atlas 2013”. It is our view, given advances in turbine technologies over recent years, that the SEAI Wind Atlas or any similar general wind resource data should not be used as a constraint for zoning areas for renewable energy development. This is a constraint that should be assessed on a project by project basis. As technologies have advanced, turbines have been developed which can yield the same energy from lower wind sites than their older counter parts. Chapter 4 - Biodiversity and Landscape ? As outlined in the preceding section, our peatland rehabilitation programme will reduce carbon emissions. However, it will also enhance and support biodiversity in Offaly. Already there are many diverse sites and habitats developing on Bord na Móna lands that support rare and

protected species and species under pressure in the wider landscape. Examples of this include the old gravel pit at Mountlucas Windfarm which supports six species of Orchids and some Red Data Book species. Other wetland cutaway sites are being used by breeding (e.g. Lapwing, Black Headed Gull) and wintering bird species (e.g. Whooper Swan) and now have National ecological value (e.g. Cavemount). Several Bord na Móna sites in Co. Offaly have already been recognised as having high biodiversity value. These include the Lough Boora Discovery Park complex (Boora, Derries, Turraun, Drinagh East, Noggusboy/Cloghan). Additional cutaway sites include Ballycon and Cavemount. Raised bog restoration has been carried out at several bog remnants including Clongawney More, Daingean-Rathdrum and Glashabaun North. This last site is also located adjacent to The Long Derries SAC.

Section 4.10: Green Infrastructure: Section 4.10 addresses the importance of Green Infrastructure for the County and the economic and social benefits of connecting greenways and blueways, particularly in rural areas. This is reiterated in Chapter 6, Section 6.5.7 which addresses walkway and cycleways along rivers, canals, disused railway lines and peatlands and the opportunities such infrastructure would bring in terms of tourism. There is also reference in Section 4.7, Peatlands to the development of a regional peatway connecting natural and cultural attractions and to the development of a National Park for raised bog peatlands in the Midlands which is reinforced. We welcome this focus with respect to the tourism opportunities that are possible and acknowledge the potential for linkage of greenways and blueways through our peat lands (via 'peatways'). We recognise the potential of our cutaway peatlands for recreation and tourism uses from the success of the Lough Boora Discovery Park and consider that 'peatways' across Bord na Móna bogs can be integrated successfully alongside other developments or biodiversity and nature conservation measures etc. with minimal impacts. Policy TRO-12 states that ".....Any development of renewable energy on cutaway bog will be required to provide increased opportunities for amenity access and education facilities". Bord na Móna welcomes and supports this policy. As outlined previously, Mountlucas Windfarm is a great example where different land-uses including renewable energy infrastructure, rehabilitated cutaway, amenity and biodiversity have all been successfully integrated. Bord na Móna will continue to support the development of amenity through its peatlands in association with future renewable energy projects. The proposal for Derrinlough Wind Farm, which is currently with An Bord Pleanála includes an amenity plan which seeks to ultimately provide connectivity from the wind farm to Lough Boora Discovery Park, which is already linked at Derries Bog and Turraun Bog to the Grand Canal, with opportunities for connectivity

through other Bord na Móna bogs in the future. Bord na Móna broadly support the relevant policies and objectives related to biodiversity, peatlands, wetlands and green infrastructure outlined in Chapter 4 of the draft Offaly Development Plan. 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 with high biodiversity value such as the Grand Canal and its associated habitats and the River Shannon. Other future Bord na Móna land use strategies and future commercial development will support the 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.

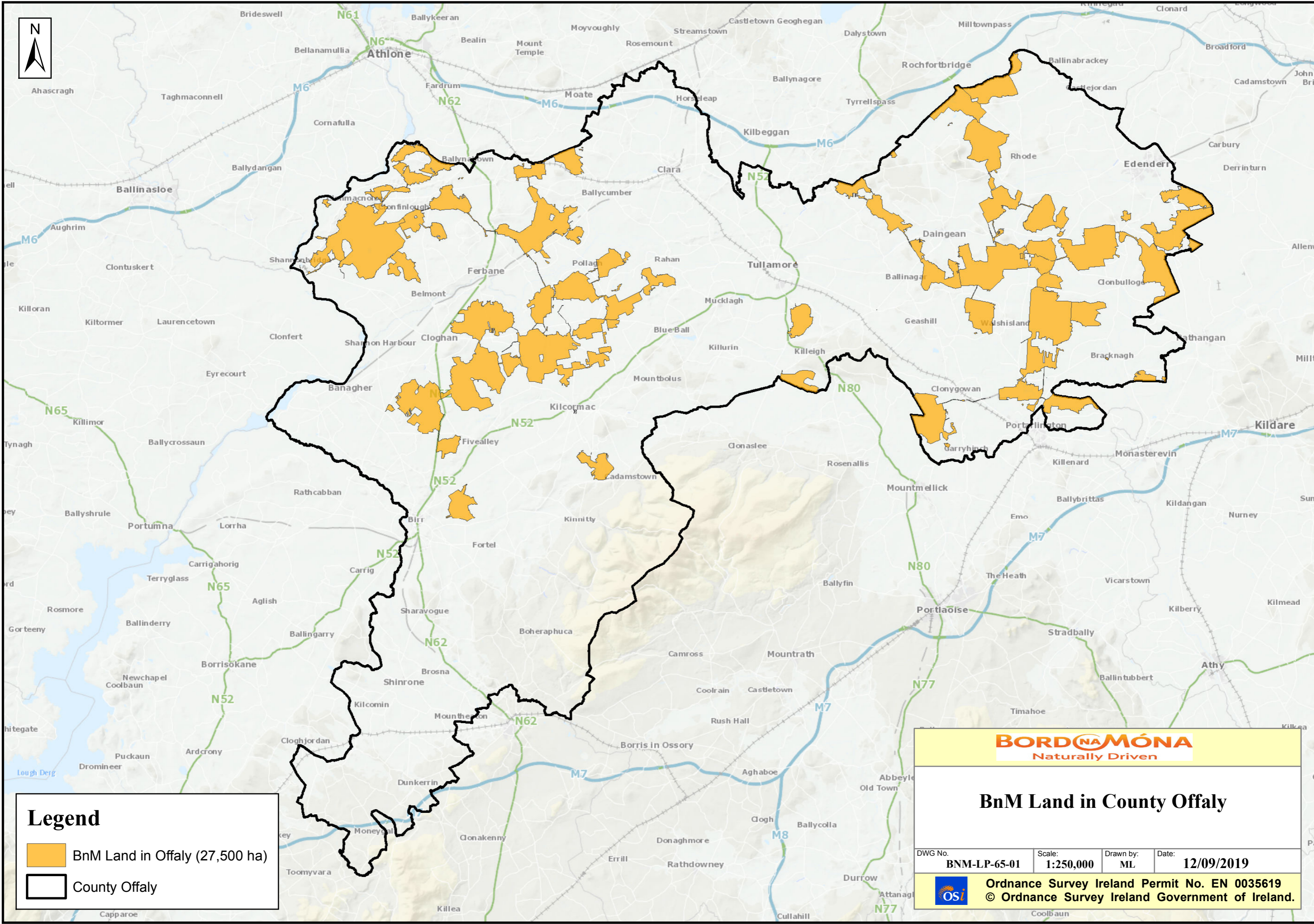
Chapter 5 Economic Development A significant portion of Bord na Móna's property holding has the potential for a variety of industrial uses. As part of the land transition programme, Bord na Móna is continually reviewing its property strategy to determine future industrial uses for the holdings. Whilst buildings such as workshops and stores comprise a small portion of the holding, these buildings present a variety of uses whether through internal use, joint venture, or external use. Situated in a variety of areas, populated and unpopulated, Bord na Móna properties meet the needs of a variety of industries, including waste recovery, SEVESO uses, logistics, storage, mineral extraction and manufacturing. Irrespective of industry scale, Bord na Móna can provide opportunities in both regional and rural areas across the entire holding. Whether a project requires the provision of buildings, sites, infrastructure, green energy or other industrial uses, Bord na Móna is committed to harnessing its industrial potential to support its mission statement of job creation and to support Government objectives across the region. In areas such as Boora, Blackwater and Derrygreenagh, areas perhaps most in need of rejuvenation and regeneration, Bord Na Mona sites can play a pivotal role in providing employment in many of the industries mentioned heretofore.

Chapter 6 - Tourism and Recreation In keeping with its Brown to Green strategy Bord na Mona through its large land holding in County Offaly has the potential to enhance tourism and community amenity initiatives by providing connectivity and access to a rehabilitated landscape potentially making the region a hub for cycle tourism, biodiversity and outdoor recreation. Helping to transform Offaly from a transit zone to a touring zone. In all cases, future company commercial and renewable opportunities will first need to be considered. The experience to date demonstrating how both Green Infrastructure (amenity) and renewable opportunities can co-exist successfully. As set out above in Chapter 4, this





potential having already been demonstrated at Lough Boora where, Bord na Mona's strategy recognises that in selecting the form and scale of any new or additional development in the Park, the priority is to maximise the socio-economic benefits to the population of its catchment area (primarily Offaly County) through providing linkages to other tourism and recreation attractions/activities on a hub and spoke basis. Failte Ireland further recognising this when stating that: "There is a wonderful opportunity for Lough Boora Discovery Park to become the "Brand Home" for Bord na Mona and embrace the industrial heritage and potential development of the acres of bog land within its portfolio and to become the central tourism attraction in the Midlands and Irelands Ancient East". This potential connectivity piece is very much aligned with the Strategy for the Future Development of National and Regional Greenways. In addition, Ireland 2040 National Planning Framework and the National Development Plan 2018-2027 recognises that the development of Greenways, Blueways and Peatways offer a unique alternative means for tourists to enjoy rural Ireland. The Action Plan for Rural Development Realising our Rural Potential highlights the potential of activity tourism to contribute to economic growth in rural areas. The Framework states that "Outdoor adventure tourism is a key growth sector worldwide and has been identified as a priority for Irish tourism in future years. The development and promotion of this sector provides opportunities for growth, in rural areas in particular, by facilitating businesses to leverage the tourism assets in their area in a sustainable way to support recreational activities such as canoeing, cycling, angling and hill walking". The publication of the Greenways Strategy to support activity tourism in rural areas is specifically identified as an action point in the Action Plan. Chapter 11 Water Services and the Environment Section 11.5.2 Waste Management The Bord na M6na estate currently supports nationally and regionally significant waste management and resource recovery infrastructure, including landfill, brown waste composting, recovery and recycling of municipal and construction and demolition waste, tyre recycling, and plastic film recycling. The current and future focus is on waste prevention, reuse, maximising recycling, and using waste as a fuel instead of fossil fuels; all elements of the circular economy strategy to boost competitiveness, foster sustainable economic growth, and generate new jobs. Given the geographic location, nature and physical characteristics of the estate, there remains significant potential for Bord na M6na to support further resource recovery operations and enable the transition to a more sustainable future and support the circular economy. Waste Management Environment Objectives ENVO-06 states: ENVO-06 It is an objective of the Council to use statutory powers to prohibit the illegal deposit and disposal of waste materials, refuse and litter, and to authorise

and regulate, waste disposal within the county in an environmentally sustainable manner. Bord na Móna request a change to this objective by including “waste collection” and change the wording to: ENVO-06 It is an objective of the Council to use statutory powers to prohibit the illegal deposit, disposal and collection of waste materials, refuse and litter, and to authorise and regulate, waste disposal within the county in an environmentally sustainable manner. Chapter 13 - Development Management Standards Section 13.9.13, Energy and Communications states: “When assessing planning applications for wind energy developments the Council will have regard to; • the Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made; and ..... • 2 km separation distance from turbines to town and village boundaries in the county as required by policy CAEP-35 of this Plan”..... Bord na Móna concurs with this approach in terms of having regard to the Wind Energy Development Guidelines for Planning Authorities, however in order for this to be applied both the County Development Plan and the Wind Energy Development Guidelines 2006 (and any subsequent guidelines) are required to be aligned. It is contended that the proposed amendment to CAEP-35 as outlined in our previous comments on Section 3.2.6: Wind Energy, should be reflected in Design Management Standard 109 (i.e. removal of the 2 KM separation distance from turbines to town and village boundaries for the reasons outlined above



### Legend

-  BnM Land in Offaly (27,500 ha)
-  County Offaly

**BORD NA MÓNA**  
Naturally Driven

### BnM Land in County Offaly

DWG No.	Scale:	Drawn by:	Date:
BNM-LP-65-01	1:250,000	ML	12/09/2019



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