

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin, D01 W6X0

By e-mail to: npf@housing.gov.ie

Our Ref.: CLS_DHPCLG_LTR_346

Date: 10 November 2017

Re: Coillte Submission to the Draft National Planning Framework – Ireland 2040 Our Plan

Dear Sir/Madam,

Coillte welcomes the opportunity to make a submission to the Department of Housing, Planning, Community and Local Government (DHPCLG) on the Draft National Planning Framework – Ireland 2040 Our Plan (NPF). We made a Submission to the Issues and Choices Paper of the National Planning Framework on 31 March 2017 which can be accessed via our web site¹ and we wish to resubmit the points that we made in regard to people’s health and well-being, sustainability and climate action, key infrastructure required for future development and implementing the NPF in the subject Submission.

Coillte’s vision is to be the best forestry and land solutions company in Europe. Over the last 30 years, we have cared for and developed our estate and businesses while being firmly focused on maximising the financial and social potential of these natural resources in a sustainable way.

We are completely committed to Ireland’s decarbonisation agenda and the consequential requirement to reshape our economy in its entirety which the Draft NPF makes references to in Chapter 8 and Chapter 9. We believe that Ireland is at a critical juncture in terms of the existing opportunity to address climate change, thus providing a key building block for sustainable economic growth and competitiveness across the whole of the island, for the future. Due to the nature of our land holding and our experience, we can make a signature contribution to the decarbonisation of the economy.

Within Coillte, our Land Solutions business is an active portfolio asset development and management business providing innovative commercial solutions to enable the attainment of key national policy objectives. Through a combination of Coillte’s longstanding heritage in the spheres of sustainability, recreation and community and our significant track-record in the renewable energy arena (specifically onshore wind through the development and construction of four wind farms totalling 230MW under the REFIT 2 regime representing a total investment of over €400m between 2010-2017), we believe that Coillte Land Solutions is now in a unique position to be a key enabler to help Ireland towards its national planning framework objectives.

To effect real change, Ireland’s response must be an inherently cross-sectoral, integrated and managed transition to a decarbonised future. We all have a part to play, and to that end we in Coillte are willing to position our assets and capabilities at the centre of a sustainable Ireland over the coming decades.

¹ <http://www.coillte.ie/media/2016/12/NPF-2.pdf>

We therefore call on the DHPCLG to articulate in NPF a greater ambition in terms of the need for Ireland to quickly transition to a low carbon economy. Additionally, we suggest that the NPF includes stronger and clearer national planning policy objectives for developing all renewable energy technologies.

Given the significant contribution that onshore renewables, and wind energy in particular, has already made and will continue to make in Ireland's energy transition, due to it representing the most viable and realistic technology for reaching our climate change targets, we would suggest that this proven technology is more explicitly acknowledged and supported by the NPF. Coillte Land Solutions will continue to be a key contributor to the re-shaping of Ireland's renewable energy supply landscape.

In our view, urgent action is now required if Ireland is to meet the twin challenges of the growing demand for renewable generation² as expressed by consumers both large and small seeking ever greater innovative solutions to securing their renewable energy needs with the tight timeframe within which Ireland must meet its legally-binding commitments under the existing EU and domestic legislative framework. In its most recent assessment the EPA has projected that Ireland will fall significantly short of its 2020 targets under the EU Effort Sharing Decision No 405/2009/EC.³ We know that the effort required to meet our 2020 targets is substantial, particularly in terms of the heat and transport sectors. In its most recent report, the SEAI has confirmed that Ireland could fall short of the 2020 16% renewable energy target in all three scenarios modelled.⁴

The challenges associated with our 2020 targets are further augmented by the legally-binding commitments made under the 2030 Climate and Energy Framework. Indeed, the latest Clean Energy for All Europeans legislative package confirms and tightens our current commitments and therefore the underlying investment and effort that is required to achieve them.⁵ We need to adopt a step change in our approach to decarbonisation over the coming five years and beyond if Ireland is to avoid falling behind, impairing our attractiveness as an economy and diminishing our prosperity.

For so many reasons including our competitiveness and economic wellbeing, the objectives of the NPF must also give us the ability to respond to both current and future population capacity pressures. In this regard we would ask the DHPCLG to reconsider whether the demographic projections set out should be more ambitious. Furthermore, we would encourage the DHPCLG to ensure that the NPF facilitates Ireland's connectivity, its water infrastructure needs, balanced regional development across all corners of the country including the midlands and the north west, investment in the digital economy including the national broadband plan and underpinning infrastructure (e.g. data centres), tourism development, new technologies and innovations (e.g. electric vehicles) and the growth of research and development nationally.

² For further detail please see EirGrid's Tomorrows Energy Scenarios 2017 <http://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Tomorrows-Energy-Scenarios-Report-2017.pdf>

³ http://www.epa.ie/pubs/reports/air/airemissions/ghgprojections/EPA_2017_GHG_Emission_Projections_Summary_Report.pdf

⁴ https://www.seai.ie/resources/publications/Irelands_Energy_Projections.pdf

⁵ For example, see Proposal for a Regulation on the Governance of the Energy Union (Article 27 (4) (c) at http://eur-lex.europa.eu/resource.html?uri=cellar:ac5d97a8-0319-11e7-8a35-01aa75ed71a1.0024.02/DOC_1&format=PDF

Ireland is at a critical juncture. Investment choices made today will deliver the infrastructure that is required to meet these targets. Excitingly, notwithstanding the known challenges facing Ireland in electricity, heating and transport, the technology is now available (and improving all the time) to plan and execute the necessary major transformation.

We share the Government's objective to manage our resources carefully and promote sustainable growth, support our citizens in safe and sustainable communities and protect our environment. Coillte will continue to remain committed to helping to deliver on these objectives and playing a pivotal role in the innovative and sustainable management of our natural resources.

We look forward to working with the Government, the Regional Authorities and many others in the development and implementation of Ireland 2040 – Our Plan and contributing to a plan that maximises our potential. We would be happy to engage in dialogue with the DHPCLG at any stage in relation to any specific matters arising.

Yours sincerely,

**sent by email, bears no signature*

Mark Foley
Managing Director, Coillte Land Solutions