

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning, Community and Local Government,  
Custom House,  
Dublin 1, D01 W6X0

By e-mail to: [npf@housing.gov.ie](mailto:npf@housing.gov.ie)  
Our Ref.: CLS\_DHPCLG\_LTR\_323  
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**Re: Coillte Submission to National Planning Framework - Ireland 2040 Our Plan**

Dear Sir/Madam,

**1.0 Introduction**

Coillte welcomes the opportunity to make a submission to the Department of Housing, Planning, Community and Local Government's (DHPCLG) National Planning Framework – Ireland 2040 Our Plan Issues and Choices (NPF). As custodians of the largest area of land in the state and sharing our Government's desire to provide a robust framework for the long term planning of Ireland's infrastructure needs and make Ireland the best country it can be, we believe that we can play a key role in supporting the delivery of many of the objectives of the NPF. As the NPF correctly calls out, we have issues in terms of Ireland's national planning challenges, however, we also have choices and options around how we enable the country realise its full potential.

We believe that Ireland is at a critical juncture in terms of the opportunity being afforded us to transform how Ireland is planned to cater for forecasted population growth, thus providing a key building block for sustainable economic growth and competitiveness across the whole of the island. To that end, it is timely for us all to pause, reflect, analyse and consult around how Ireland can be an exemplar in terms of National Spatial Planning in the interests of all stakeholders, both this generation and the next.

Our submission broadly follows the order and themes that are set out in the NPF Documentation and is structured as follows:

1. Overview of Coillte
2. People's Health and Well-Being
3. Sustainability and Climate Action
4. Key Infrastructure Required for Future Development
5. Implementing the NPF
6. Conclusion

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## 1.1 Overview of Coillte

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 28 years, the organisation has developed the forests and strategic elements of the land bank, has grown the estate to over 439,000 hectares, and today provides stewardship over approximately 6.4% of the total land mass in the country. During this time we have provided the public with a huge range of benefits from recreation, to critical infrastructure, to environmental services and our Forestry business underpins a thriving export-led Forest Products Sector which support €2.3<sup>1</sup> Billion of economic activity. Coillte has approximately 900 employees across Ireland and the UK, supporting indigenous employment and comprises three discrete businesses, Land Solutions, Forest and Medite Smartply (Panels) which delivered €89.6million EBITDA in 2015. Our vision is to make Coillte the best forestry and land solutions company in Europe.

## 1.2 Coillte Land Solutions

The Coillte Land Solutions business is an active portfolio asset development and management business that is particularly focused on enabling key national policy objectives, particularly those that will be prescribed by the NPF and will cover a range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism and agriculture. We generate recurring revenue by partnering, developing and adding value where the lands that we manage are suited to activities other than forestry. We recognise that strategically located lands will continue over the period of the NPF and beyond, to offer development potential for a wide variety of sustainable and innovative projects that can positively contribute to the proper planning and sustainable development of the country. We are deeply committed to supporting and developing relationships with the communities living near our projects and delivering tangible benefits to those communities

## 1.3 Coillte's Forest and Panels Businesses

Forestry in Ireland has the potential to double in size over the next 10 years and Coillte will play a leadership role in this growth. We use innovative technology in our supply chain and forest management practise are independently certified by FSC<sup>2</sup> (Forest Stewardship Council®) and PEFC<sup>3</sup> (Programme for the Endorsement of Forest Certification). Our forests and forestry products are also playing an increasingly important role in mitigating the effects of climate change. MEDITE SMARTPLY, our panels manufacturing business, is the market leading manufacturer of environmentally produced, sustainable timber construction panels. Exporting its products to over 30 countries, it also manufactures Smartply Propassiv which is the world's first airtight panel, as classified by the Passivhaus Institute.

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<sup>1</sup> Source: "An overview of the Irish forestry and forest products sector 2016", Irish Forestry and Forest Products Association

<sup>2</sup> FSC Licence Code FSC-C005714

<sup>3</sup> PEFC Licence Code NSAI-PEFC FM.006

## 2.0 People's Health and Well Being

Uniquely to any public landowner, Coillte has a Recreation Policy and welcomes an estimated 18 million visits to our forests every year to flagship destinations such as Wild Nephin in Co. Mayo and Lough Key Forest Park in Co. Roscommon. We are the leading provider of outdoor recreation in Ireland with more than 3,000 kilometres of trails, 260 recreational sites and 12 forest parks. Having been a 'first mover' in attracting Center Parcs to Ireland, we are proud to have provided the land required to enable the development of the first resort of this kind in Ireland as it will generate €30 Million per annum for the local economy in Co. Longford. We want to enhance the recreational products on offer across our estate wherever possible and contribute to the development of commercial tourism in Ireland, particularly in areas that have a high amenity value due to their stunning location.

Ireland has the potential to become a world leader in outdoor recreation and Coillte is perfectly positioned to lead in this area. Since 1966, when the first forest park was opened to the public, we have developed the most innovative, attractive and engaging recreation facilities in the country and are seen as the thought-leaders in this area, however, we can do more. We want to create a step-change in the provision and maintenance of outdoor recreational facilities and opportunities on state lands and waters. To that end, the 'Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021', which Coillte developed with Waterways Ireland and others, sets out the case for a new annual budget, not only to maintain existing facilities, but also to establish new world class recreation facilities that will provide not only benefits in terms of health, well-being and quality of life, but also support rural development and tourism. We have measured that Coillte's recreational facilities generate €300 Million of visitor spend on accommodation, retail and guided services in the rural economy. We have also demonstrated the high value-add potential of some of our properties for instance through the co-location of forestry, nature conservation, renewable energy, recreational facilities and community schemes in the one place.

We believe that living in the locality of a Coillte Wind Farm should be a positive experience not only from a sustainable energy perspective, but also from a local development and experience perspective. We are the first development company in Ireland to combine an operating wind farm, commercial forestry operations and enhanced amenity and recreation facilities with public access in one location. We have therefore a bespoke wind farm Community Benefit Scheme for communities close to our wind farms that remain active for the 25 year lifetime of the project. The design of the scheme is unique to each project and is moving towards a participatory model where the design is driven by the community that both administer and avail of the scheme. It can include: Contributing to the improvement of local recreational amenities; supporting local projects that benefit the wider community; and, engaging with local communities in enhancing sustainable energy awareness, use and efficiency. We are also actively looking at options that may enable us to support community based energy efficiency schemes and models which can support community ownership structures.

In summary, Coillte wishes to continue to play a significant role in the creation a 'healthier places' legacy that can be handed over to Ireland's next generation. To plan for this, we would recommend that:

1. Coillte lands that have multi-functional potential for co-existence use, including renewable energy, high amenity value and commercial tourism potential should be identified, zoned and prioritised for having this development capability wherever possible, particularly where there is a unique opportunity to create next generation, added-value and innovative places.

2. Recognition should be given in the NPF to the contents of the 'Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021'.
3. The standards that we have set through our work on the development of 'Community Benefit Schemes' should be recognised as being a national exemplar and a significant contributor to achieving what the NPF describes as 'Excellence in Rural'.

### 3.0 Sustainability and Climate Action

Coillte Land Solutions is one of the biggest developers of renewable energy in the state. To date, we have enabled in excess of 40% of all installed wind projects in Ireland in our role as supplier of lands, rights of way, way leaves and as a developer in our own right. Our current development projects will deliver enough renewable energy to power 300,000 homes by 2019. Experience has proven that Coillte's lands possess some of the best wind regimes in Europe due, inter alia, to their altitude, expansive area, aspect and location. They are also particularly suitable for wind farms, large scale solar and energy storage projects due to their remoteness, already established accessibility, 'brownfield' nature, distance from dwellings, proximity to the national grid infrastructure and visibility relative to areas with high scenic amenity. In working to realise the potential of our estate for renewable energy developments that will help deliver on Ireland's decarbonisation ambition, we carefully consider the social, economic and environmental impact a project may have on its surrounding area. We also procure and replant replacement lands to compensate for every hectare of land that may require felling to enable the construction of our projects.

We 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. Our web site ([www.coillte.ie](http://www.coillte.ie)) contains further details regarding all of our projects. Perhaps one of the most effective ways to meet our climate change and energy obligations is for the NPF to identify suitable locations where both Strategic Energy Zones (areas where wind energy, solar energy and energy storage solutions can co-exist) and Transmission Corridors should be located. We believe that the decarbonisation of the electricity system is the single best catalyst to delivering a decarbonised social and economic environment as it fundamentally enables the decarbonisation of transport and heat through electrification, both of which have proven to be extremely challenging in the period to 2020. The NPF can promote the development of green infrastructure, the use of electric cars, electric heating and the expansion of infrastructure capacity to facilitate demographic change and balanced regional development.

We recognise that the proper treatment and disposal of waste water is a key challenge to the sustainable growth and health of our nation. The existing modus operandi where approximately 400 waste water treatment facilities have no licence and are not monitored simply cannot continue and must be addressed as a matter of urgency. Integrated Constructed Wetlands (ICWs) can provide an environmentally friendly and cost effective solution to help address this problem, particularly for small agglomerations in rural locations, while also providing an enhanced recreational amenity such as that provided by the existing ICW at Castle Leslie in Co. Monaghan. Coillte land can provide suitable locations for the development of this proven technology across a range of sectors including agriculture, food, residential and rural towns.

In summary, we recommend that the NPF:

1. Recognises that the Coillte estate contains some of the most suitable areas for the development of large-medium scale sustainable renewable electricity projects.
2. Considers the merits of locating Strategic Energy Zones or Corridors in suitable areas such as those locations where Coillte can be a key enabler of the best-in-class delivery of these projects.
3. Considers the benefits that ICWs can provide to rural locations where such waste water treatment solutions can resolve existing water quality issues and can provide solutions for next generation, strategically planned rural population zones.

#### **4.0 Key Infrastructure Required for Future Development**

In order for Ireland to be the best country it can be, we must put in place the fundamental infrastructure framework required to serve our country including the necessary transportation, energy, communication, housing, healthcare and recreational facilities. Coillte land has both historically and will in the future, enable the realisation of better infrastructure across a range of sectors. In addition to the contribution that we have made to date in helping Ireland reach its legally binding 2020 renewable energy targets, we have made a valuable contribution to other key infrastructure initiatives including the existing National Broadband Scheme, the Apple Data Centre in Co. Galway, the Corrib Gas project, road, water and telecommunications infrastructure, housing, education, healthcare, industrial and community developments. We are poised and ready to help realise both the expansion of existing infrastructure and the enablement of new infrastructure, particularly strategically significant projects that are of national importance.

A key question that must be asked, as the answer should inform the outcome of this exercise, is, what are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years? Our suggested answers to this question, and projects that we would be happy to help deliver include:

1. The National Broadband Plan.
2. Sustainably designed urban extensions that can help solve the housing crisis.
3. Eliminate the wastewater treatment deficit and ensure that households and industry have access to a clean and reliable water source.
4. Complete the Motorway Network and critical transport infrastructure.
5. Electrification of Public and Private Transport.
6. Electrification of Heating across all sectors.
7. Lands that could enable anything from data centres that enable us to cater for our data demands to senior housing for our aging population.
8. Exemplar projects, the range and types of which may or may not be known yet.

## 5.0 Implementing the NPF

We welcome the proposal that a statutory process for the making of the NPF and its implementation be put in place under the Planning and Development (Amendment) Bill 2016 and that interdepartmental structures will be development to ensure that the main proposals of the NPF are given top-level commitment. It is important that all Government expenditure complies with the adopted NPF. We know that joined-up thinking is key and in that respect, we are ready, willing and eager to engage at all levels. Aware that the opportunities for the future development of our lands contributing to the future prosperity of our nation are almost limitless, we have over the last 6 months proactively met with each of the 3 Regional Authorities and all 31 Planning Authorities in addition to a multitude of other key agencies both public, private and semi-state.

We have proven leadership qualities across a vast variety of projects. We are committed to the realisation of a better spatially planned nation and adding value to 'Ireland Inc.' through our shared aim of planning for the right development to take place in the right places at the right time. We have the proven capabilities and in-house expertise to help deliver a better Ireland, be that on our own or through partnership models. We remain fully open for business.

## 6.0 Conclusion

We have a proud heritage and exciting future and the NPF has come at an opportune time when we must act now to strategically plan in a clear and decisive way for the next 20 years. We welcome the proposed evidence based approach of the NPF and are here to help in any way we can. 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 supporting and helping to deliver on these objectives.

We believe that Coillte lands are well placed to play a key role in the necessary and planned growth and prosperity of our nation and have proven them to have excellent multi-functional and valuable capabilities. We wish to remind the DHPCLG that we are a future thinking and outward looking commercial semi-state partner that is fully aligned to government and EU policy in terms of our approach to proper planning and sustainable development. In all instances and wherever the opportunity arises, we are committed to playing a pivotal role in the innovative and sustainable management of our natural resources and maintaining a 'can do' attitude.

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 faithfully,



Mark Foley  
Managing Director, Coillte Land Solutions