

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

9 November 2017

**Submission to the Department of Housing, Planning, Community and Local Government on
'Ireland 2040 Our Plan – Draft National Planning Framework'.**

Dear Sir/Madam,

Bord na Móna welcomes the opportunity to make a submission in relation to the '*Ireland 2040 Our Plan – Draft National Planning Framework*', published in September 2017. As outlined in our previous submission on the Issues Paper, given the range of Bord na Móna's operations on a national scale and the extent of our land bank we believe Bord na Móna is well placed to continue to make a significant contribution to national objectives and generate substantial commercial, social and environmental value particularly in rural Ireland.

This submission will provide commentary on the draft National Planning Framework in addition to suggestions for amendments/enhancements to the proposed plan.

1. Introduction

As outlined in our previous submission on the Issues and Choices Paper in March 2017, Bord na Móna plc was established in 1946 to develop Ireland's peatland resources and currently provides a diverse range of products and services to various sectors and geographic markets. We are currently in a period of significant change and transition as we implement a strategy to diversify into new sustainable business areas and grow the company for the future. Central to this transition is the use of our land bank for a range of beneficial uses such as renewable energy, industrial uses (e.g. Data Centres), biomass, nature and biodiversity as well as recreation and tourism. As Bord na Móna owns c. 80,000 hectares of land the transition from peat production to a variety of new uses will be one of the biggest land transformations in modern Irish history. One of the key commitments made by Bord na Móna in recognition of this transition is the proposed cessation of the production of peat for electricity generation by 2030.

Bord na Móna has assessed the potential future uses of its lands and in 2011 developed a document entitled '*Strategic Framework for the Future Use of Peatlands*'. This document was appended to our previous submission and in essence outlines that Bord na Móna's approach is to seek to generate commercial, environmental and social value from all our lands through a mix of appropriate new uses including renewable energy and other developments.

2. Draft National Planning Framework – Observations and Comments

The Bord na Móna land bank of c 80,000 hectares represents circa 1% of the land in the state. While significant areas remain in peat production the majority of these lands will become cutaway or will not be used for peat operations within the timeframe of the NPF. Given the extent of these lands and the potential mix of sustainable future uses in terms of commercial, social and environmental uses, we believe Bord na Móna is in a position to make a significant contribution to meet national objectives particularly in rural areas of Ireland.

Given the unique nature, character and scale of Bord na Mona's cutaway lands we believe that the future use of these lands has the potential to make a significant contribution to national policies and objectives across a range of sectors including renewable energy, industrial development and job creation in rural areas, ecosystem services and biodiversity as well as tourism and recreation. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located.

Given that these lands represent c 1% of the land in the state and that they have the potential to bring significant benefits to rural Ireland across different sectors we suggest that this should be recognised in the NPF.

The optimisation and the realisation of the full potential value of the company's land bank is dependent on national, regional and local planning. It is in this context that Bord na Móna wishes to make the following comments on the Draft National Framework Plan.

2.1 Chapter 4: Planning for Diverse Rural Places

Bord na Móna welcomes the text in Section 4.6 (under the sub-heading Energy Production (page 71)) on the role that rural areas have to play in securing a sustainable renewable energy supply. We agree with the Department, that the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of rural land and that "*the country's cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass*". We welcome the proposal to prepare a medium to longer term strategic national land use plan for peatlands in state ownership in order to manage their most appropriate future use and look forward to working with the Department in this regard. We believe that this strategic plan should consider all beneficial uses of Peatlands including commercial, social and environmental. National Policy Objective 21 at the end of the section does not reflect any of this text and we request that the NPF incorporates the sentiments expressed in the text on page 71 into National Policy Objective 21 as follows [proposed additional text shown in Bold]:

"National Policy Objective 21:

*Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, **renewable energy generation**, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same*

time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.”

2.2 Chapter 5: People, Homes and Communities

When the issues and choices paper was published in February 2017, it stated that “If Ireland is to make up for lost ground in relation to carbon reduction targets and move towards the objective of a low carbon and climate resilient Ireland by 2050, it is necessary to make choices about how we plan for future growth. A key role for the National Planning Framework will be to assist in reinforcing the structural changes required to transition to a low carbon sustainable economy and society. This will require us to make decisions about how we balance growth with more sustainable approaches to development and to examine how planning policy can help shape national infrastructural decisions.” (Paragraph 5.2.6)

Bord na Móna welcomed this statement and encouraged the Department to take this opportunity to outline essential future energy infrastructure development. In the recently published draft Framework Plan there are many statements reflecting this sentiment and referencing Ireland’s need to transition to a low carbon economy and, with regard to the energy sector in particular, how achieving this transition with renewable sources of energy is an integral part of Ireland’s climate change strategy. While we welcome National Policy Objective 57 which commits to promoting “renewable energy generation at appropriate locations within the built and natural environment to meet objectives towards a low carbon economy by 2050”, it is our view that the framework does not go far enough in addressing the changes that need to be made to address future growth and associated energy demand. According to the Environmental Protection Agency¹, Ireland is not currently on the right track to meet its 2020 targets and incur significant fines as a result. More renewable capacity will be required by 2030 and onwards to 2050. Bord na Móna wishes to play an active part in Ireland meeting its carbon targets and would like to see the framework set out specific and tangible planning policies for renewable energy developments. Planning has an important role to play in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. The NPF should signpost the nature and extent of energy infrastructural changes and developments that will be needed to facilitate a low carbon and climate resilient Ireland. Planning policy is the key driver in initiating such change and the NPF should bring clarity and direction to this area to ensure that Ireland progresses along the low carbon pathway to 2050.

2.3 Chapter 8: Realising Our Sustainable Future

Section 8.1 of the draft framework states the following under the heading *Energy Policy and Planning*:

“In the energy sector, transition to a low carbon economy from renewable sources of energy is an integral part of Ireland’s climate change strategy and renewable energies are a means for reducing our reliance on fossil fuels. The forthcoming Renewable Electricity Policy and Development Framework will aim to identify strategic areas for the sustainable development of renewable electricity projects of scale, in a sustainable manner, compatible with environmental and cultural heritage, landscape and amenity considerations. The development of the Wind Energy Guidelines and the Renewable Electricity Plan will also be prioritised to facilitate informed decision making in onshore renewable infrastructure”.

It is our view that many of the issues that arise on renewable energy projects can be ascribed to the absence of specific and consistent policy to pave the way for essential development. The National

¹ EPA Press release dated 10th November 2016.

Planning Framework should assist in this regard in providing clear direction where land use change is inevitable and where it will contribute to meeting emissions targets through its suitability for renewable energy development. It is critical that each of these documents are delivered in the immediate future in order to ensure the advancement of the renewable energy industry in Ireland. It is proposed that either as part of or in conjunction with the National Planning Framework, a defined timeline and clear milestones with regard to the finalisation of both policies should be outlined in particular for the Renewable Electricity Policy and Development Framework. The ongoing delay to the publication of these documents is restricting the successful progression of renewable energy developments through the planning process. Renewable energy policy should be detailed, clear and concise so that it is evident to all stakeholders what is required in order to develop a secure energy future for an estimated future population of 8 million people over the life of the plan.

2.4 Chapter 9: Investing in Ireland 2040 - Implementation

It is stated in Section 9.1 that in order to achieve the national objective of a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, new energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

EirGrid has a significant programme of transmission projects in various stages of development required to facilitate the connection of contracted large scale renewable projects, which will play a vital role in meeting our 2020 targets. However, it is also clear that further large scale transmission projects will be required to:

1. Facilitate the connection of additional on-shore and off-shore renewable projects; and
2. Connect major sources of demand to renewable energy.

It is the company view that demand side management and the electrification of heat and transport coupled with small scale renewables will bring a limited amount of control at a local level. In that context transmission development will continue to be required to facilitate the connection of projects of scale. Similar to other leading countries in terms of renewable penetration, there should be a focus on delivering grid access to the best renewable projects in those locations with the optimum capacity factor. Investment in grid development for a project occurs only once, whereas supporting projects with inferior capacity factors can lead to higher costs to the consumer over the life of a project.

In many cases investment in grid development in remote or rural areas could have a twofold benefit:

1. Providing grid access for the most efficient renewable projects; and
2. Developing grid access to a level suitable for large demand outside of the 5 main cities.

3. Conclusion

In conclusion we would reiterate that we consider our cutaway peatlands to be suitable for a wide range of sustainable and beneficial uses, including renewable energy, industrial development, recreation, biodiversity and nature etc. and in many situations these uses can be co-located. Given the extent of these lands they have potential to make a significant contribution to a number of national targets in the years ahead. It is therefore important that the proposed NPF recognises this potential and

that it is reflected in regional plans and county development plans. Bord na Móna welcomes the proposal to prepare a medium to longer term strategic national land use plan for peatlands in state ownership in order to manage their most appropriate future use.

We would be happy to meet to discuss this submission with you in more detail, if required.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'AMC', with a long horizontal line extending to the right.

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Anna Marie Curry

Company Secretary and General Counsel

Bord na Mona plc