

North and West Regional Assembly (NWRA),

By email to: rses@nwra.ie

Our Ref.: CLS_NWRA_LTR_080219

Date: 8th February 2019

Re: Coillte Submission to NWRA Regional Spatial and Economic Strategy Draft Plan

Dear Sir/Madam,

Coillte welcomes the opportunity to make a submission to the North and West Regional Assembly (NWRA) on the Regional Spatial and Economic Strategy (RSES) Draft Plan.

Coillte is deeply focussed on enabling key national policy objectives that cover a range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism and agriculture. In particular we are one of the biggest developers of renewable energy in the state.

Forestry in Ireland is a modern progressive industry that currently provides over 12,000 jobs mostly in rural areas in Ireland. The value of the industry currently stands at over €2.4 billion and this industry is set to double in size in the next ten years. Coillte is the largest forest company in Ireland and as stated in our submission on the Issues Paper [16th Feb. 2018], amongst other things, Coillte, and Irish forestry plays 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.

Identifying Renewable Energy Sites of Scale in the Region

Coillte welcomes the Council's response to suggestions in our pre-draft submission and the inclusion of an objective in the RSES to coordinate the identification of renewable energy sites of scale with local authorities and Stakeholders within 3 years of adoption of the RSES. (Objective 39)

A similar objective is also proposed in the other Regional assembly areas and we suggest the potential of the entire country should be identified in a closely aligned exercise that meets the energy transition targets that must be delivered across the State as a matter of urgency.

Coillte has stewardship of a significant portion of lands within the regional assembly area and significant expertise in renewable asset development and management and requests inclusion in this process as one of the key stakeholders.

We also suggest the 'renewable energy sites of scale' referred to in the objective should accommodate energy storage solutions and/or other associated projects that may arise as technologies evolve in the future. It should be noted that a regional approach to strategically locating battery storage facilities would take significant pressure off the national grid during periods of high demand.

We welcome the objective in the Strategy to encourage the development of transmission and distribution grids to facilitate renewable energy projects (objective 41). Joined up thinking is required to ensure the successful delivery of renewable energy projects and their associated grid connections in a timely manner that addresses the requirements of the EIA Directive and the issues raised in O’Grianna v An Bord Pleanala. One method of facilitating these linkages is to identify the grid infrastructure corridors in tandem with the identification of the ‘energy sites of scale’.

We also welcome RPO 78 whereby the Assembly will support the co-operation and coordination between local authorities in determining landscape character along their borders. It seems logical that this approach should extend to lands within each county and not just at the borders and that this should be led at a regional level in the short term in the context of existing and emerging national landscape policies, plans and assessments.

There is an urgent need for the above objectives to be put in place in order to meet the dual challenges of the growing demand for renewable generation expressed by consumers, and the legally-binding commitments under the existing EU and domestic legislative framework.

Outdoor recreation

Coillte welcomes the inclusion of Section 5.8 ‘Our Natural Networks - Greenways’ in the draft Strategy. We wish to create a step change in the provision and maintenance of outdoor recreational facilities and opportunities on state lands and waters. To this end Coillte developed the ‘Outdoor Recreational Plan for Public Lands and Waters in Ireland 2017-2021’ with Waterways Ireland and others. This 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.

Specific reference to supporting this Plan would be welcomed as a stand-alone objective in the Strategy in Section 5.8, or as an amendment to RPO 97.

Forestry

Coillte recognises the Assembly’s initiative in setting up a regional fora for sustainable afforestation across the Region and the motivation underpinning it (objective 103). It is however, imperative to point out that forestry, and afforestation in Ireland is fully regulated by the Forest Service, Department of Agriculture, Food and the Marine. The Forest Service enact a suite of environmental guidelines which regulate licenced activities including afforestation. There is a risk, that the forum could be duplicating the work of the Regulator in this instance and it is imperative that this Framework does not inhibit or interfere with the statutory consenting process(es) and standard practices that govern all forestry activities in Ireland. In addition, there must be balanced representation within any proposed Fora and this must include Coillte as Ireland’s State owned national forestry organisation.

Conclusion

Coillte believes there is a unique opportunity for the RSES to promote the successful and timely delivery of critical renewable energy infrastructure and that strong leadership by the Assembly is required to ensure Ireland achieves its sustainability targets in the short and medium term.

We would strongly welcome the opportunity to meet to give an overview of Coillte's ambitions and targets in achieving key national policy objectives that cover a range of industries including renewable energy, forestry, housing, health care, education, inward investment, infrastructure development, water, tourism and agriculture, (as detailed in our pre-draft submission paper) and to explore synergies between Coillte and the Assembly's ambitions to deliver on the proposed RSES objectives.

Yours sincerely,

[No signature, sent by email]

Sinead O'Malley

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