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Via Email:- rses@emra.ie

23 January 2019

Submission to the Eastern and Midland Regional Assembly on the Draft Regional Spatial and Economic Strategy.

Dear Sir/Madam,

Bord na Móna welcomes the opportunity to make a submission in relation to the *Draft Regional Spatial and Economic Strategy (RSES)* for the Eastern and Midland Region, published in November 2018.

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 make a significant contribution to national objectives and generate substantial commercial, social and environmental value in rural Ireland, and in particular the Irish Midlands.

This submission will provide commentary on the Draft RSES in addition to suggestions for amendments/enhancements to the proposed strategy.

1. Introduction

Notwithstanding Bord na Móna's general support for the Draft Regional Spatial and Economic Strategy (RSES), it is felt, at a high level, that the current version misses the opportunity to redress the current regional imbalance. In particular, the future role that large Midlands towns can play in supporting Dublin, in terms of housing, employment, commuting and quality of life appears not to have been optimised. Bord na Móna believes that larger Midlands towns are capable of being economic engines provided the strategic policy allows for their development and that the importance of intra-regional connectivity (in particular the N62, N62 and N80 corridors to the M4, M6 & M7) be explicitly recognised in the RSES.

As outlined in our previous submission, 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 presently in a period of significant change and transition as we implement a strategy 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 uses such as renewable energy, industrial uses (including but not limited to data centres, biomass cultivation, aquaculture, nutraceuticals (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 Bord na Móna owns c. 80,000 hectares of land (1% of the land in the state) the transition from peat production to a variety of new uses and activities will be one of the biggest land transformations in modern Irish history.

Having assessed the environmentally and economically sustainable future use of its lands, Bord na Móna has set out its future land use '*Strategic Framework for the Future Use of Peatlands*'. This document was referenced in our previous submission and in essence outlines Bord na Móna's Strategy 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; and acknowledges Bord na Móna's long-term commitment to the sustainable economic development of the wider midlands region, for the benefit of and to support its rural communities.

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 welcomes the draft RSES and has the following observations and comments.

2. Draft Regional Spatial and Economic Strategy (RSES) – Observations and Comments

While significant areas are currently in peat production the majority of these lands will become cutaway or will not be used for peat operations within the timeframe of the RSES.

2.1 Regional Strategic Outcomes

Section 2.3 of the RSES outlines 16 No. Regional Strategic Outcomes (RSOs) that have been developed to achieve the goals set out in the National Strategic Outcomes (NSOs) of the National Planning Framework. Three of these RSOs are very closely aligned with the objectives of Bord na Móna's '*Strategic Framework for the Future Use of Peatlands*' document and our ongoing transition, as follows:

“9. Support the Transition to Low Carbon and Clean Energy

Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)

10. Enhanced Green Infrastructure

Identify, protect and enhance Green Infrastructure and ecosystem services in the Region and promote the sustainable management of strategic natural assets such as our coastlines, farmlands, peatlands, uplands woodlands and wetlands (NSO 8, 9)

11. Biodiversity and Natural Heritage

Promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection. (NSO 7, 8)”.

In addition, Bord na Móna has traditionally, and is planning to continue its 'enterprising' role in supporting rural communities both economically and via the social cohesion that sustainable employment brings to rural towns and villages. Bord na Móna therefore believes that aligning the RSES with its '*Strategic Framework for the Future Use of Peatlands*' that a material contribution can be made to addressing the existing regional imbalance in line with the following RSOs:-

3. Rural Communities

Support sustainable rural development by managing urban generated growth in areas under strong urban influence and by encouraging sustainable growth in areas that have experienced decline or stagnation. (NSO 1,3)

12. A Strong Economy supported by Enterprise and Innovation

To build a resilient economic base and promote innovation and entrepreneurship ecosystems that support smart specialisation, cluster development and sustained economic growth (NSO 5,10)."

It is our view that the proposed RSES should set out how it is intended that these 'outcomes' will be delivered. While a lot of focus is given to green infrastructure, and conservation of Biodiversity and Natural Heritage in the Draft RSES, the detail on how the Eastern and Midlands Region will transition to a low carbon economy is not as focused, nor is the recognition of the economic and employment potential that this 'just transition' could deliver to rural towns, villages and communities by leveraging the Bord na Móna landbank for a range of beneficial uses such as renewable energy, industrial development, biomass cultivation, aquaculture, nutraceuticals (herb cultivation), ecosystem services and biodiversity, recreation and tourism.

Bord na Móna welcome the acknowledgement of its *Strategic Framework for the Future Use of Peatlands* contained in the draft RSES. We believe that this Strategy is consistent with the objectives of the National Planning Framework, in particular section 5.4, as well as the Regional Strategic Outcomes outlined above. However, Bord na Móna believes that the RSES is an opportunity for the EMRA to go further and to clearly signal its support for Bord na Móna as it endeavours to lead a 'just transition' from industrial peat extraction in an environmentally and economically sustainable way which enhances and supports the rural communities which it has served for generations and is committed to serve for future generations. We therefore respectfully request the inclusion of a new specific Regional Policy Objective at section 4 of the RSES in which the EMRA pledge their support to:

"... achieving a 'just transition' to a low carbon economy by working with key stakeholders in the Region, in particular Bord na Móna, incorporating and supporting any relevant policies such as Bord na Móna's Strategic Framework for the Future Use of Peatlands."

2.2 Green and Blue Infrastructure

Section 6.5 outlines that the Midlands has *"a diverse and relatively unspoilt landscape presenting a broad range of tourism related opportunities in its inland waterways, lakes, canals, rivers, mountains, forests, parks, eskers, peatlands, architecture and historical demesnes"*. This sentiment is reflected on a number of occasions in the RSES, and is encapsulated in objective RPO 6.16 which states the following:

"RPO 6.16: Support the maintenance of, and enhanced access to, state lands such as National Parks, Forest Parks, Waterways, etc for recreation and tourism purposes and built heritage".

There is also reference to the preparation and implementation of *'Visitor Experience Development Plans'*, *'Local Authority Tourism Strategies'* and *'Diaspora Strategies'* and development of 'peatways' in conjunction with the Greenway and Blueway network (Section 7.6). Particular reference is also made to the development of a National Park based on the raised bog peatlands of the Midlands which is reinforced through the following objective:

"RPO 7.19: Support the consideration of designating a National Park for the peatlands area in the Midlands."

We welcome this focus on the midlands with respect to the tourism opportunities that are possible, and welcome potential linkage of greenways and blueways through our peat lands. We recognise the potential of our cutaway peatlands for recreation and tourism uses and in our previous submission made reference to Lough Boora Discovery Park (www.loughboora.com), an area of over 2,000 hectares which has been developed in conjunction with local community groups over the last two decades. Today Lough Boora has a visitor centre, a network of walking and cycling trails, a sculpture park, lakes etc. and attracts over 100,000 visitors each year bringing economic benefit to the midlands region.

We believe there is potential to develop further sites for recreation and tourism on emerging cutaway lands and in many instances recreation can be integrated into commercial developments. The opening up of Mountlucas Wind Farm in County Offaly for amenity use is an excellent example of this integrated approach where commercial uses can be co-located with amenity uses. Indeed, this is an approach we are taking forward for consideration in all of our renewable development projects. Bord na Móna continues to work with other state organisations to progress recreation projects. A current example of this is the Lough Ree and Mid Shannon

Wilderness Project which seeks to develop the mid Shannon area as a major tourism destination based on sustainable developments.

Further, it is our view that the development of the aforementioned strategies and plans should take place in consultation with all relevant stakeholders, including Bord na Móna. This should be stated in the RSES so that a balanced approach can be agreed that does not obstruct or impact on the achievement of other national policy objectives.

This section of the Draft RSES also details the background and Regional Objectives in terms of ‘Growing the Blue Economy’ via Fisheries and Aquaculture, however, the focus appears exclusively to focus on the regions marine resources. This narrow approach excludes the potential that on-shore aquaculture developments can deliver for the region – a case in point being the Bord na Móna fully consented aquaculture facility (fish farm) at Mountlucas Wind Farm. It is therefore respectfully suggested that RPO 7.5 be amended to read:

*“EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood **and on-shore aquaculture** sector in the Region, **and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.**”*

2.3 Decarbonising Electricity Generation

When the RSES Issues Paper was published in November 2017, Bord na Móna welcomed text included on page 45 under the sub-heading ‘Landuse’ which referred to the important regional role that the peat bogs in the Midlands have *“in terms of land management and as carbon sinks, but also [] combined energy and amenity potential and new tourism and local employment opportunities”*. It was our view that the text mirrored wording in the Draft National Planning Framework, which was in the public domain at the time, on the role that peatlands and rural areas have to play with regard to accommodating future national renewable energy generation.

We were pleased to note, when the finalised National Planning Framework was published, that it had stayed strong on this sentiment stating that:

“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment and respecting the needs of people who live in rural areas.”

“In relation to peatlands, some of Ireland’s cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass. Considering the significant amount of peatlands in the ownership of semi-State bodies, a medium to longer-term strategic national land use plan for peatlands in State ownership will be prepared in order to manage their most appropriate future use, building on the existing National Peatlands Strategy and other national policy related to peatlands conservation and management.”

And

“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.”

While the Draft RSES addresses the importance of peatlands for sequestering carbon, mitigating flood risk, amenities and biodiversity and states that the Regional Authority, in conjunction with Local Authorities in the region, will identify Strategic Energy Zones (under RPO 7.34) it is our view that it the Draft RSES has not enforced the position taken in the NPF regarding the suitability of cutaway bogs for renewable energy generation. Reference is made to Bord na Mona’s ‘Strategic Framework for the Future Use of Peatlands’ in Section 7.7 of the Draft RSES (page 128) and the accompanying sentence states that this framework *“indicates that sites that have been cutaway will be made available for alternative uses including alternative energy (wind, biomass), agriculture & horticulture, forestry, biodiversity and ecosystem services, amenity and tourism”*. This reinforces our call as expressed in section 2.1 above for a clearer endorsement of this strategy. Indeed, a significant portion

of our landholding has already been committed to a variety of future uses most notably wind; solar; biomass; aquaculture; and nutraceuticals projects. Some of these projects are operational, for example Bord na Móna's Wind Farms in the Midlands, the aquaculture development at Mounthucas; biomass trials in Cúil na Móna, Boora and Derrybrat and nutraceutical (herbs) studies at various locations. In addition, other projects are under construction, for example Oweninny Wind Farm in Mayo and others are consented, for example Cloncreen Wind Farm in Offaly. Many others are either going through the planning process or preparing to be lodged namely Timahoe North Solar Farm, Derryadd and Derrinlough Wind Farms and the Cúil na Móna Renewable Gas Project. Once consented Bord na Móna will also work towards getting these projects constructed in order to develop renewable generating assets.

A key element of Bord na Móna's corporate strategy is to grow our power generation business. We already power a quarter of a million Irish homes and the objective is to double this by 2025. Half the electricity we produce is now generated from renewable sources. We believe that our cutaway bogs will continue to play an important role in the generation of renewable energy 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.

We would encourage the RSES to outline the importance that cutaway bogs have in terms of renewable energy generation. Our 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 integrated¹ renewable energy projects and associated developments.

In addition to the projects mentioned above, Bord na Móna have other lands in the region namely the Ballydermott, Ballivor, Derrygreenagh, Boora and Mounddillon bog groups. These bogs are extensive in nature and were identified as having industrial/renewable energy potential in the '*Strategic Framework for the Future Use of Peatlands*'. There also remains potential to develop other activities at these locations collocated with renewable developments. It is our view that the RSES should make reference to the potential that these lands have for renewable energy generation and indeed other beneficial uses including industrial, commercial, social and environmental.

2.4 Future Energy Needs in the Eastern and Midlands Region

In Section 7.8 '*Climate Change*' the Draft RSES outlines that an increase in electricity demand in the region is likely resulting from increased population and economic development and a move away from the use of fossil fuels. The Draft RSES goes on to say that "*in order to ensure security of electricity supply the Strategy must address this increased demand for electricity in such a way as to strike a balance between addressing the need for a significant shift towards renewable energy and enabling resources to be harnessed in a manner consistent with the principles of proper planning and sustainable development*".

As outlined in our submission on the RSES Issues Paper last year, the RSES presents an opportunity to outline essential future energy infrastructure development for the Eastern and Midlands Region. Ireland's 2020 target, that 16% of our energy must be generated from renewable sources (40% of our electricity), is a binding number set by the EU. As outlined in the Issues Paper and reported by the Environmental Protection Agency², we currently look set to fall short of this target and incur significant fines as a result. More renewable capacity will be required by 2030 as the renewable energy target increases to 32%³ across the EU member states. The issues paper outlined that there were opportunities for Ireland to become a leader in the transition to a low carbon and resource efficient economy yet there is no detail defined in the Draft RSES describing the extent of what is required in order for us to achieve our targets.

It is our belief that a primary focus of the proposed RSES should be to set out specific planning policies for renewable energy developments (including the **supply and sourcing** of bioenergy resources, expanding the current draft objective of RPO 7.36) and should signpost the energy infrastructural changes and developments

¹ In this sense, 'integrated' includes where appropriate a combination of complimentary generation technology, energy storage, electrical transmission/distribution infrastructure, potential onsite large volume off-takers (e.g. data centres).

² EPA Press release dated 10th November 2016.

³ European Parliament Press Release dated 14th June 2018

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 RSES needs to bring clarity and direction to this area to ensure that Ireland progresses along the low carbon pathway to 2050.

As we have outlined previously, 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. While we welcome the commitment in RPO 7.34 that the Regional Authority, in conjunction with Local Authorities in the region, will identify 'Strategic Energy Zones' for larger renewable projects and an acknowledgement that:

"It is necessary to establish a consistency of approach by planning authorities, both in identifying areas suitable for renewable energy development and having regard to potential impacts..."

Bord na Móna believe that the renewable energy potential of a region should be determined on a regional basis, and not county by county. It is our view that the text in RPO 7.34 should be strengthened to state that the Regional Authority will lead this process, within a specified timeframe, to ensure that the potential of the entire region is identified and aligns with national targets.

2.5 Landscape Character Assessment

Bord na Móna welcomes the text in Section 7.7 on Landscape and in particular the text addressing Landscape Character Assessment (LCA). We agree with the Draft RSES that there are gaps and inconsistencies in Local Authority approach to the preparation of LCAs which can and does have knock on effects on the development of Wind Energy Strategies and the designation of lands suitable for Wind Energy Developments.

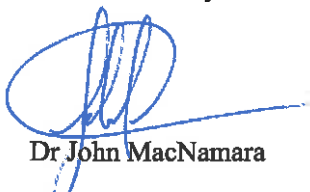
We look forward to the publication of a National Landscape Character Assessment, and hope it will provide the consistency and guidance that is needed for the development of more localised landscape character assessments. We also welcome the commitment in Objective RPO 7.25 that a Regional LCA will be prepared by the Eastern and Midlands Regional Assembly following the adoption of the National LCA. It is our view that this approach is essential in order to ensure that county and local level policy is aligned with regional and National policy.

3. Conclusion

In conclusion, we would reiterate that we consider our cutaway peatlands and former industrial buildings and complexes to be suitable for a wide range of sustainable and beneficial uses, including renewable energy, industrial development, biomass cultivation, aquaculture, nutraceuticals (herb cultivation), ecosystem services and biodiversity as well as recreation and tourism noting that 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, most especially the transition to a low-carbon economy. It is therefore important that the proposed RSES recognises, endorses and supports this potential.

We would very much welcome the opportunity to meet with the EMRA and its advisors to discuss this submission and the fundamental issues addressed in it.

Yours Faithfully



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