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By email to: rses@emra.ie
Our Ref.: CLS_EMRA_LTR_230119
Date: 23rd January 2019

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

Dear Sir/Madam,

Coillte welcomes the opportunity to make a submission to the Eastern and Midland Regional Assembly (EMRA) on the Regional Spatial and Economic Strategy (RSES) Draft Plan.

As stated in our submission on the Issues Paper [16th Feb. 2018], amongst other things, Coillte 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. In this regard, Coillte welcomes *REGIONAL POLICY OBJECTIVES (RPOs) 7.34, 7.35 and 7.36*, to decarbonise electricity generation.

In particular Coillte welcomes the proposal in RPO 7.34 for EMRA to identify Strategic Energy Zones in conjunction with Local Authorities in the Region. Coillte believes strong leadership is required to realise this objective and requests the Assembly take overall responsibility for delivering this initiative in the short term and that this is expressed in the policy. ERMA should lead the identification of suitable areas for larger renewable generating projects, to ensure a consistent approach is used throughout the region and the potential of the entire region is identified in a single exercise that aligns with the energy transition targets that must be delivered across the entire state. Where and how the renewable energy potential of a Region is to be best-harnessed, must be determined on a regional basis, and not county by county.

Also as stated in RPO 7.34 a regional landscape strategy should be developed to support the delivery of projects within these zones. In this regard RPO 7.25 is noted and we welcome the Assembly's role in delivering this in the short term and in the context of existing and emerging national landscape policies, plans and assessments.

There is an urgent need for these two initiatives (Strategic Energy Zones and Regional Landscape Strategy) 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.

Coillte also welcomes RPO 10.15 which supports and "*facilitates linkages of renewable energy proposals to the transmission grid*". 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 would be to identify grid infrastructure corridors in tandem with the identification of Strategic Energy Zones. Coillte suggests that RPO 7.34 be ameliorated to tie these two objectives together.

In relation to the draft wording of RPO 7.34, it refers to “*larger energy generating projects,*” being located in the zones. We suggest these zones also accommodate energy storage solutions and/or other associated projects that may arise as technologies evolve in the future and that the final wording of the policy should reflect this. 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.

In order to clarify and address the above points the following revisions (black inserts) to RPO 7.34 are proposed below for the Assembly’s consideration:

RPO 7.34: EMRA shall, in conjunction with Local Authorities in the Region and as a matter of high priority lead the identification of Strategic Energy Zones as areas suitable for larger energy generating projects, storage projects and/or other such associated projects that may arise as technologies develop in the future, and lead the identification of associated grid infrastructure corridors. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones. Environmental constraints will ensure all environmental constraints are addressed in the analysis. EMRA shall also identify the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas.

Coillte welcomes the reference in the draft RSES to the “*Strategy for Future Development of National and Regional Greenways*” in RPO 7.24. That Strategy in turn notes the potential to link the regional Greenways to those in the separate ‘Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021’ (linked [here](#)), which Coillte developed with Waterways Ireland, NPWS, Bord na Mona and IFI. The latter Plan 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 significant benefits in terms of health, well-being and quality of life, and also support for rural development and tourism. Specific reference to supporting this Plan would be welcomed as part of RPO 7.24 as follows:

RPO 7.24: Support Local Authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways and the Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021.

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, 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
Planner Manager, Coillte Land Solutions

