

Forward Planning Policy Unit

Galway County Council

Aras an Chontae

Prospect Hill

Galway

H91 H6KX

Sept 2020

Re: Galway County Council Development Plan 2022 – 2028: Bord na Móna submission in response to Public Consultation Issues Paper.

Dear Sir/Madam,

Since its foundation Bord na Móna has been part of the socio-economic and cultural fabric of County Galway. The company has contributed significantly to economic development and employment in the County and in doing so supporting many communities throughout the County. This is reflected in the geographic footprint the company occupies within the County which extends to just under 7,325 hectares.

As a global community, we are faced with the challenge posed by climate change and as a society we have acknowledged the need to meet this challenge. In keeping with this, Bord na Móna is committed to decarbonising its business and while we have embarked on this journey some time now, the pace of this transition has increased in recent years and continues to increase at pace. The impact this transition is having on the communities which we support, and the wider economy and social fabric of Galway is not lost on us. As we continue this challenging journey we are committed to repurposing and applying our assets, not least our land assets, to support and develop the future economy of Galway.

However, with these challenges come opportunities, some which we have identified such as in the area of renewable energy, more which are in development such as aquaculture and more still which we have yet to even identify. In framing your new County Development Plan, it is important that we not close the door to the range of future commercial and job creation opportunities which may be supported by Bord na Móna's land and property assets within the county.

In this context, it is important to reflect on the nature and uniqueness of this significant landholding. While somewhat fragmented in geographical spread, much of the company's estate is characterised by large tracts of land. This is a somewhat uncharacteristic feature in the context of Irish landholding and therefore offers unique opportunities for a multitude of uses not readily suited to smaller dispersed landholdings. This, coupled with proximity to the national electricity infrastructure and relative isolation from residential areas, is particularly suited to the development of renewable energy such as windfarms and solar farms and other large-scale energy dependant industrial development. Most of our peatland has been utilised for industrial peat extraction for decades and consequently much of the overlying peat deposits has been cutaway. Some other sites in Galway have only been in peat production for a shorter period of time and consequently have deeper residual peat. As we exit peat extraction activities, this cutaway will be stabilised through the implementation of a rehabilitation programme with significant

portions of these lands rewilding and supporting biodiversity and other ecosystem services. We believe that it is possible to successfully integrate this emerging biodiverse and amenity rich landscape with other commercial, industrial and employment generating uses. Some sites with high biodiversity value will not be developed for commercial and industrial use and will ear-marked for biodiversity and other compatible uses.

This is exemplified in the transformation of our Mountlucas property in county Offaly which has changed from a site with a single use (peat harvesting) to one hosting a rich mosaic of complimentary activities. Over the last decade an 84MW windfarm has been developed on the site. The windfarm supplies over 50,000 homes with renewable electricity while providing a sustainable income which in turn supports significant local community investment. With the wind assets occupying a mere 5% of the 1,100-hectare site, this rehabilitated cutaway has helped significantly mitigate carbon emissions and also developed into a rich ecosystem with a range of different habitats for native plants and animal species. The site also provides a new significant public amenity with over 10km of walking/running/cycling tracks for people living in the local communities. In addition, the company has also developed a number of new business projects on the site including the first closed loop re-circulation aquaculture facility at this site and another involving the cultivation of high value herbs used in the production of alternative medicines and food supplements.

In 2011 Bord na Móna published its long-term land use strategy, *Strategic Framework for the Future use of Peatlands*. Much of the strategy outlined in this framework document still holds true and is relevant; however, with the significant and accelerated change that has taken place in the intervening period and with the emergence and identification of new potential future land uses, we have engaged in a review of this framework. We expect to publish a revision of the *Strategic Framework Bealach Ur, Bealach Glas* in the coming weeks, it will be made available to stakeholders and in time for you to take it into consideration as part of the development of the draft County Development Plan.

Your public consultation issues paper invites submission across a broad range of important topics. Given Bord na Móna's significant geographic, economic and social reach within the County we believe Bord na Móna can make significant positive contributions across many of these areas. In particular, we believe we have a significant role to play in delivering on climate action & energy policy, supporting natural heritage and biodiversity, growing tourism, fostering the establishment of new, sustainable industrial and commercial development and supporting rural and urban regeneration.

Climate Action and Renewable Energy

The scale of the climate change challenge and the need for decisive, positive action to mitigate climate change is reflected in the Government's decision to declare a climate emergency in May 2019, followed by the publication of the Government's Climate Action Plan in June 2019. The ambition behind the plan is to:

... deliver a step-change in our emissions performance over the coming decade, so that we will not only meet our EU targets for 2030, but will also be well placed to meet our mid-century decarbonisation objectives. This Plan [the Climate Action Plan,] underpins this ambition by setting out clear 2030 targets for each sector and the expected emissions savings that will result.¹

¹ *Climate Action Plan*, 2019 at page 12

Central to the Government's plan is the acceleration of the transition to renewable electricity generation with an overall target of achieving 70% renewable electricity by 2030. Achieving this will involve:

...phasing out coal- and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.²

Specifically, the Government are targeting increased electricity generated from renewable sources indicatively comprising:

at least 3.5 GW of offshore renewable energy

up to 1.5 GW of grid-scale solar energy

up to 8.2 GW of onshore wind capacity³

Furthermore, the National Planning Framework, *Project Ireland 2040*, (NPF) contains a specific objective for Ireland to transition to a competitive low carbon, economy by the year 2050 and to shift from predominantly fossil fuels to predominantly renewable energy sources. This is echoed in the Regional Spatial and Economic Strategy for the Eastern and Midlands Region which calls out the need for us to *"better leverage [our] natural resources to increase our share of renewable energy... and harness the potential for a more distributed renewables-focused energy system"*.

The potential for utilising the extensive Bord na Móna landholding to support renewable energy generation is specifically called out in the National Planning Framework:

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.⁴

Bord na Móna recognise this potential and have worked and continue to work to harness this potential. We have developed Mountlucas wind farm, Offaly, Bruckana wind farm and Oweninny Phase 1 in Mayo. We have commenced construction of a 63 MW wind farm at Cloncreen County Offaly and Oweninny Phase 2 will commence construction later this year. We recently got planning permission for a 96 MW windfarm at Derryadd in County Longford and an 84 MW wind farm on Clongawny and Drinagh bogs (Derrinlough Wind Farm) in West Offaly is with An Bord Pleanála for consideration. In addition we also recently got planning permission for the development of a 70 MW solar farm in Timahoe, County Kildare. There remains significant potential to develop renewable energy projects on our remaining land assets. In all we are advancing plans which could ultimately deliver as much as 1 Giga Watt of additional renewable generation across our estate. As outlined previously, there are circa. 7,325ha of Bord na Móna lands within County Galway. These lands have the potential to make a significant contribution to meeting national and regional policy objectives across a range of sectors. There also remains potential to develop other activities on these lands and it is our view that the County Development Plan should consider all beneficial uses of Peatlands including energy, commercial, social and environmental.

² *Climate Action Plan*, 2019 at page 53

³ *Climate Action Plan*, 2019 at page 53

⁴ *Project Ireland 2040* at page 35

The role of appropriate peatland management in furthering and achieving climate change mitigation targets is also recognised in the Climate Action Plan as follows:

Peatlands represent 64% of our total soil organic carbon stock, representing the largest store of carbon in the Irish landscape. This store is very vulnerable, especially to drainage for forestry, grazing and extraction. We will develop and better manage our carbon sinks with the following measures:

- *Restore/rewet all raised bogs designated as Special Areas of Conservation and Natural Heritage Areas... Such restoration measures and hydrological management of our protected peatlands will halt and reduce peat oxidation and carbon loss*
- *Undertake further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy.⁵*

Given the company's commitment to decarbonisation and the hastening of the cessation of industrial peat extraction for energy production, there exists an opportunity to enhance and accelerate our rehabilitation programme. In addition, more of our estate will be "cut-over" as opposed to "cut-away" with greater depths of residual peat and so affording opportunities to achieve more climate action and biodiversity objectives with our rehabilitation programme: with this objective in mind, we are currently developing plans to significantly accelerate and enhance our rehabilitation programme. Enhanced rehabilitation looks to optimise climate action benefits by creating the most suitable hydrological conditions through a combination of drain-blocking, bunding, re-profiling and other measures. This will be particularly beneficial for sites with residual deeper peat that have the potential to grow Sphagnum mosses again, in suitable hydrological conditions. Carrying out this work will accelerate the trajectory of these sites towards becoming carbon sinks again. Successful rehabilitation does take time to develop naturally functioning peatland habitats.

Several bogs in Co. Galway have already been restored (e.g. Moyarwood). Recent research carried out by the EPA found that this bog is now a greenhouse gas sink only 8 years after the bog restoration programme was completed⁶.

Ultimately the vast majority of our former industrial cutover peatlands will be rewet and otherwise rehabilitated with the objective of supporting the re-establishment of thriving peatland environments with associated carbon mitigation and sequestration potential. This will support the main carbon mitigation land use objectives of the National Climate Action Plan.

Infrastructure and Economic Development

Bord na Móna has played, continues to play and has the potential to play a significant role in the economic development of the County. As set out earlier, the unique nature of our landholding, industrial, remote and with access to key infrastructure opportunities exist to support industries that require scale which is not readily achievable elsewhere in the country let alone the county.

⁵ *Climate Action Plan*, 2019 at page 106

⁶ An EPA funded research programme (Renou-Wilson, F., Wilson, D., Rigney, D., Byrne, K., Farrell, C. and Müller C. (2018). Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits (NEROS). Report No. 238. Report prepared for the Environmental Protection Agency. Johnstown Castle, Co. Wexford)

In addition, the company's existing network of workshops and production facilities hold opportunities for the re-purposing of these facilities for new sustainable industries.

In County Galway, the extensive industrial site known as Derryfadda along with our site at Clonfert are promising sites for a variety of uses and may alleviate shortfalls in industrial manufacturing or warehousing industries following renovations or repurposing. Their central locations make them key assets in developing or enabling new businesses and relevant zoning is of utmost importance to their future.

The Galway County Development Plan should acknowledge this potential and stand positioned to support appropriate commercial and industrial development on Bord na Móna's land and can do so secure in the knowledge that given the scale and spread of Bord na Móna's land and property assets, suitable commercial and industrial development can be harmoniously co-located within a biodiverse and ecologically rich rehabilitated peatland landscape: as demonstrated by our property at Mount Lucas in County Offaly and as proposed in our wind farm development projects as referenced previously.

Natural Assets & Green Infrastructure

As we transition away from commercial peat production and decarbonise our business the rehabilitated cutaway will naturally revert to a rich and diverse natural habitat enhancing biodiversity and supporting other ecosystem services. We are committed to protect and enhance this ecologically rich landscape and firmly believe that we can do so while integrating other sustainable land-uses, including renewable energy and other commercial development: as demonstrated at our Mountlucas property as discussed earlier. The Bord na Móna baseline Ecological Survey has already identified species and habitats of high biodiversity value within the Bord na Móna land-holding in Galway. For example, bogs adjacent to the River Suck have already been attracting internationally important numbers of Whooper Swans, a species of conservation interest that is a qualifying interest of several nearby SPAs. Several bogs have already been restored in Co. Galway (Moyarwood, Leneragh, Paul's Lough, and will be assessed for designation as conservation sites by the state for the presence of Annex raised bog habitats. This will significantly support the state's biodiversity and climate action objectives. These will all be considered when decisions are made about future commercial development projects. Rehabilitation has already been carried out on the Attymon Bogs. Rehabilitation is also ongoing in Castlegar Bog where a pilot programme is examining the suite of enhanced rehabilitation measures.

Examples of Bord na Móna enabled green infrastructure include the restored Abbeyleix bog (County Laois), which is now leased to the local community, and who now manage it as a conservation project, The Abbeyleix bog is part of a Natural Walking Loop and is a very popular local walking route located in a natural landscape. Bord na Móna continues to play a role in the management of this site. A small area at Lismanny has been leased to the local community, who have developed a small amenity with a boardwalk. This project continues to be supported by Bord na Móna.

There are future opportunities to develop green infrastructure on Bord na Móna sites in Co. Galway. For example, Kellygrove Bog is expected to be restored in 2021. This restoration will support the development of green infrastructure along a planned trackway that runs along the edge of this site (the old Ballinasloe Canal). There is also potential to develop cycleways and walkways through Bord na Móna sites in Galway (as part of the planned greenway between Athlone and Ballinasloe). The development of these trackways will also support the development of green infrastructure along these routes (other associated habitats such as grasslands and scrub along the tracks). Bog rehabilitation will create environmentally stable sites that can be used and enjoyed by local communities as well as integrating other commercial land uses in appropriate areas.

Future Bord na Móna land-use strategies and future Bord na Móna commercial development will support the Galway County Development Plan in the development of green infrastructure.

Supporting Rural & Urban Regeneration

Accessibility and connectivity to amenities is crucial. Cutaway peatlands have enormous potential to provide quality recreational areas for both local and national users. By developing cycle and walkways the greater region has the potential to become more accessible to all sections of society. The bogs of Kilmacshane, Lismanny and Garryduff with their proximity to the River Shannon and River Suck have enormous potential to further enhance existing tourism initiatives such as Irelands Hidden Heartlands and the Beara Breifne Way. If done in conjunction with a well thought out tourism plan there is real potential to create sustainable tourism jobs within the local communities.

That said, it is important to maintain a balance which recognises the suitability of a particular site as a potential future amenity or as a site which can be developed for the purposes of commercial activity: which will also have the effect of strengthening local rural economies and communities.

Bord na Móna are pioneers in the development of community benefit schemes providing significant funds for investment in catchment communities for rural, town and village regeneration supported by the commercial renewable energy developments such as Mountlucas in County Offaly.

Such funding presents a major opportunity for communities near wind and solar farms to benefit from flexible, long-term, private sector investment with the potential to draw in additional matched funding under the Renewable Electricity Support Scheme (RESS). With the Government target of 70 per cent of electricity coming from renewable sources by 2030, it is conservatively estimated that the cumulative value of community benefit contributions from 2020 to 2030 would be approximately €250 million for wind energy alone.

This is not just an opportunity for the communities living close to renewable energy projects; it is a green opportunity – a significant portion of the money invested in community benefit funds will be used to drive the decarbonisation of communities, to cut energy bills for families and fight fuel poverty, invest in the green economy infrastructure and create jobs.

In conclusion, this period of significant transition for Bord na Móna is by extension a period of significant change for Galway County, in particular, the significant impact this transition will have on the economy and employment. While there are many challenges, there are also many opportunities and in framing our future County Development Plan, we need to be cognisant of these opportunities and ensure that the final plan supports this potential.

Yours sincerely,

JP McGrath
CFO and Interim Land & Property Development Manager
Bord na Móna Plc.