

Monday, 16th November 2020

Submission no: 99.

Development Plan Review,
Planning Department,
Clare County Council,
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RE: DEVELOPMENT PLAN REVIEW

A Chara,



1.0 Introduction

Coillte welcomes the opportunity to make this submission to Clare County Council in response to the publication of the *Clare County Development Plan 2022-2028 Issues Paper*, dated 18th September 2020.

This section provides a summary of the Coillte group and thereafter sets out commentary on the Issues Paper. It is requested that the Council has regard to this submission, in the preparation of the draft *Clare County Development Plan 2022-2028*.

Coillte is the largest forest company in Ireland and, amongst other things, Coillte, and Irish forestry play 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.

Coillte was established as a commercial semi-state company in 1989, with a diverse forest estate of approximately 396,000 hectares of land.

Over the last 30 years, the organisation has developed the forests and strategic elements of the land bank. It has grown the estate to over 440,000 hectares, and today provides stewardship over approximately 7% of the total land mass of the country. During this time Coillte has provided the public with a huge range of benefits from recreation, to critical infrastructure (including telecoms and wind energy), to environmental services.

Coillte has approximately 900 employees across Ireland and the UK, and comprises four discrete businesses;

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Forestry, Land Solutions, Renewable Energy and Medite Smartply (Panels).

The forest sector provides around 12,000 jobs today, mostly in rural Ireland. Coillte's **Forestry** business underpins a thriving export-led Forest Products Sector which supports circa €2.3 billion of economic activity. Coillte grows forests sustainably to produce quality wood and wood products. Ireland's forest industry will approximately double in size over the next 10 years and Coillte will be at the core of this initiative with an innovative supply chain and a consistent reinvestment in the next generation of forests. Our forests and forest products are playing an increasingly important role in mitigating the effects of climate change.

Coillte is also Ireland's leading provider of outdoor recreational activities nationally, with over 3,000km of hiking trails, 12 forest parks and 260 recreational sites, including those located in County Clare. Every year it is estimated that there are over 18 million visits to our forests nationwide for outdoor recreation activities.

Within Coillte, **Land Solutions** and **Renewable Energy** are active asset development and management businesses providing innovative commercial solutions to enable the attainment of key national policy objectives particularly those that are prescribed by the *National Planning Framework (2018)*. The businesses span a wide range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism and agriculture. Coillte has a longstanding heritage in the spheres of sustainability, recreation and community and a significant track-record in the renewable energy arena (specifically on-shore wind through the development and construction of four wind farms totalling 230MW representing a total investment of over €400 million between 2010-2017). The Renewable Energy business also has a very high level of ambition in terms of delivery of new wind energy infrastructure in the period to 2030 and beyond.

In June 2019, Coillte established a new not-for-profit entity, **Coillte Nature**, which is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland. Coillte Nature is seeking to deliver significant impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:

- 1) Reforesting by planting new native woodland
- 2) Restoration of important biodiversity habitats
- 3) Regeneration of urban forests
- 4) Rehabilitation of critical ecosystem services

In January 2020, the team commenced work across a number of priority projects such as the Dublin Mountains Makeover, the Midlands Native Woodland Project and Restoring Hazelwood Forest Project. Coillte Nature will continue to see new collaborations, partnerships and projects rolled out under these themes, all with the common objective of wilder woods for Ireland.

2.0 Submission to Clare County Council on the Clare County Development Plan 2022-2028 Issues Paper

2.1 Forestry, Tourism / Recreation and Community

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Clare County Council to deliver on local and wider needs in a manner which aligns with the overall vision for the county.

We are rooted in communities all over Ireland and our record of providing land for and facilitating local sports clubs is a good demonstration of that local commitment. We will also continue to work with communities and the Council to facilitate the development of a wide range of accessible recreational, community and sporting facilities, ranging from playing pitches, clubhouses to walking trails and playgrounds, such as at Cratloe Woods. In this regard, should the Council wish to pursue further strategic recreational development in the county; Coillte is committed to working collaboratively with the Council in providing same at appropriate locations within the Coillte estate.

Coillte is particularly proud to have helped deliver significant recreational developments including Center Parcs in Longford. The development of this site created 750 jobs during construction and resulted in over 1,000 long term associated jobs. It is estimated that the location of Center Parcs at Ballymahon will generate in the region of €30 million per annum to the local economy.

Forestry

As noted above, Ireland has a vibrant forest industry today which supports over 12,000 jobs mostly in rural Ireland. Despite having the lowest forest cover in Europe at just 11% compared to a European average of over 40% this sector contributes over €2.3 billion annually to the economy.

Ireland has a competitive advantage for tree growth, our natural oceanic climate and mild winters means that certain conifer tree species can reach commercial maturity in just 35 years which can often take up to 80 years in central and northern Europe. The wood grown from these Irish trees is a valuable commodity and is used for a variety of applications, in construction, in pallet manufacturing and in the processing of innovative panel board products among others. Using Irish, locally grown, wood and wood based products for construction is a climate efficient and sustainable substitute for conventional carbon heavy construction products, such as concrete, brick and steel.

The regulation of the forestry sector is overseen by the Department of Agriculture, Food and the Marine who ensure that all the environmental, economic and social aspects of forestry and forest operations are considered fully before licences to carry out operations are issued. The issuing of licences may also be

challenged and queried by the public and subject to a robust framework of appeal overseen by the Forestry Appeals Committee. The Department have oversight of the primary legislation governing all aspects of forestry in Ireland, The Forestry Act 2014 and this Act is specifically cognisant of growing forests for a variety of benefits to Irish society, including biodiversity, recreation and wood production.

The ownership of Irish forests today is approximately 50% privately owned and 50% State owned and many private owners (over 21,000 in total in Ireland) have invested significantly in growing their forests to commercial maturity. In addition, all of the State's forests management practices are fully certified as sustainable according to precise national and international criteria.

Coillte respectfully propose that the regulation of forest practices and policy resides with the Department of Agriculture, Food and the Marine and their professionally qualified inspectorate. Given the current issues emerging around climate change and the ability of sustainably grown wood products to address this challenge our forests and forest management practices have never been more relevant.

We note that Coillte manages 25,727 hectares of forestry in County Clare, and allows members of the public to access the forests for amenity use, according to the principles of Leave No Trace. Coillte is committed to managing its forest estate in County Clare in a fully sustainable manner and to continue to work in partnership with the Council and other stakeholder groups within the county.

Coillte is committed to protecting and enhancing the recreation infrastructure in County Clare, including the walking trails at Ballycuggaran, Cahermurphy, Cratloe Woods Forest Recreation Area, Doon, Gragans Wood, and Kilrush (at Vandeleur Demesne). With significant expertise in the delivery of recreation infrastructure; Coillte welcomes the opportunity to explore the provision of further recreation infrastructure at appropriate locations in the Coillte estate in partnership with Clare County Council and relevant stakeholders in the county.

Tourism/Recreation and Community

The Issues Paper identifies that there is a wide range of natural and built assets across the county which have established a strong local tourism base, further supported by County Clare forming a key part of Fáilte Ireland's Wild Atlantic Way and Ireland's Hidden Heartlands tourism strategies. It is considered that supporting the growth of passive and active recreation through the provision of suitable tourism/recreation infrastructure, will continue to protect and enhance the tourism sector in the long term.

Located at a range of scenic locations in the county, the Coillte estate is in a strong position to play a key role in supporting the provision of new tourism and recreation uses, including thematic tourism/active recreational projects at appropriate locations. It is considered that investment in outdoor recreation and forest-based activities drives economic activity, supporting job creation and sustaining local communities.

Further, it is considered that the provision of tourism accommodation, including accommodation which caters for the growing active / recreational market, has the potential to significantly enhance the tourism sector, as referenced in the Strategic Issues Paper. The nature of the Coillte estate can facilitate the provision of forest-based tourism accommodation, at a range of locations, whilst protecting and enhancing the built and natural assets of the county.

In this regard, Coillte supports the continued inclusion of policies in the forthcoming draft Clare County Development Plan under which tourism/recreation facilities including tourism accommodation can be facilitated at suitable locations in the Coillte estate. Coillte looks forward to working in partnership with the Council, and stakeholders in this regard.

2.2 Infrastructure and Development

Coillte supports the development of green infrastructure as referenced in the Issues Paper, and welcomes the opportunity to work in consultation with the Council to further explore the development of this infrastructure, where appropriate within the Coillte estate.

Coillte supports the consolidated growth of towns and villages, in accordance with the provisions of the *National Planning Framework (2018)* and the *Southern Regional Assembly Regional Spatial & Economic Strategy (RSES), 2030* as referenced in the Strategic Issues Paper.

The Coillte estate includes lands which are within close proximity to town and village centres including, for example, those at Cratloe. It is considered that these lands could also provide for and accommodate some alternative uses which would positively contribute to the sustainable development of the county, supporting and enabling national and regional policy objectives.

In this regard, the Council is requested to consider the provision of planning policies / land use zoning objectives where appropriate, to support the provision of development on Coillte lands where suitable; to provide, for example, tourism, commercial, community and residential and/or other uses which would support and enable national, regional and local policy objectives.

2.3 Renewable Energy

As mentioned above, Coillte is one of the biggest developers of renewable energy in the State and has enabled in excess of 30% of all installed wind farms through wayleaves/rights of way and as a land supplier and developer. We are also targeting the delivery of 1GW of new on-shore wind projects enabled by Coillte lands in the period to 2030 and currently have a 19 wind turbine project in Co. Clare due to be lodged to An Bord

Pleanala (ABP pre-application Ref. 303105-18) in the coming months and a planning application for a wind farm comprising 10 wind turbines that is pending a decision at time of writing from Clare County Council (Ref. P20/658).

Subject to receipt of necessary regulatory approval, the Renewable Energy business unit of Coillte will be transferred to a newly formed joint venture later in the coming months, co-owned on a 50:50 basis by Coillte and ESB.

The Challenge of our Generation - Climate Action Plan 2019 and Renewable Energy Targets

On 17th June 2019 the Government published the 'Climate Action Plan 2019' (CAP). This sets out the agreed course of action over the coming years to tackle climate breakdown. It is a visionary and transformational plan and at its heart recognises that "We [Ireland] are close to a tipping point" and "decarbonisation is now a must if the world is to contain the damage and build resilience in the face of such a profound challenge." (Exec. Summary pg. 8)

In particular the CAP places the decarbonisation of the electricity sector at the centre of its ambitions. In real terms it mandates this sector to move from 12 million tonnes of CO₂ equivalent emissions in 2017, to 4.5 million tonnes by 2030. In other words a massive reduction of 7.5 million tonnes (62.5%).

Other sectors namely Transport, the Built Environment, Agriculture and Industry are also tasked with significant CO₂ emission reductions but of a comparatively lower order namely 37.5%, 31.25%, 7.5% and 6.25% respectively. This makes transforming the electricity sector the single greatest lever in the CAP in terms of CO₂ reduction (Ref. EirGrid Strategy Launch 2019, CEO presentation).

The 2019 CAP provides a roadmap of what must be achieved and requires 70% of all our electricity to come from renewable energy sources by 2030. This almost doubles our current target of 40% by 2020. To achieve the 70% target, the CAP earmarks a target of 3.5GW off-shore wind and a doubling of existing on-shore wind from circa 4GW (today) to 8.2GW by 2030. We request that this target and any update thereof is specifically referenced in the new County Development Plan. It is important that this reliable and established source of renewable energy continues to be recognised, promoted and facilitated in the new Plan.

To put the scale of the ambition into further context it should be noted that it has taken 20+ years to achieve the current level of renewable penetration onto the Grid. The challenge is now to achieve twice as much in half the time.

The 2020 programme for government further commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to move to net zero

emissions by 2050. The 2050 target will be set in law by the Climate Action Bill, the draft text of which was published on 7th Oct. 2020. This increases the CAP off-shore target to 5GW; proposes a strengthened role for the Climate Change Advisory Council, proposes an annually revised Climate Action Plan and new oversight and accountability by the Oireachtas. Every sector must contribute to meeting the 2050 target by implementing policy changes as outlined throughout the programme for government.

Coillte believes that planners working in all tiers of government (national, regional, local) and the planning profession in general needs to step forward and frame this ambition in the form of plan-led 'Renewable Energy Strategies' (RESs) as an utmost priority.

Coillte believes that planners have the unique skills and experience to establish a clear and consistent plan-led approach to the delivery of this considerable quantum of renewables. Planners have a responsibility to ensure an appropriate, plan-led framework is in place to provide certainty and predictability to the market and to ensure the appropriate balance between all land use constraints and opportunities, and community and other interests.

In terms of certainty to the market it should also be noted that changes to various Government renewable energy policies in recent years has put planning permission as the critical first stage of all renewable energy projects. Only when planning permission is secured can a project apply for a grid connection to export energy to the national electricity grid (which may require a separate planning consent) and then seek to identify a route to market to sell the energy that will be generated. This can be an overall lengthy and sequential process that needs to be underpinned by a robust plan-led framework to ensure time and resources are correctly focussed if we are to achieve national targets.

Southern Regional Spatial and Economic Strategy & a Regional Approach to Renewable Energy Strategies

The Southern Regional Spatial and Economic Strategy (RSES) also clearly recognises the urgent need to transition to renewable energy. Policy RPO 98 and RPO 99 of the RSES state:

"RPO 98: It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

RPO 99: It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines."

Coillte strongly supports the development of a Regional Renewable Energy Strategy to complement the local authority approach; which would co-ordinate the identification of sites of scale and ensure inter county consistency in relation to designating renewable energy zones and identifying landscape sensitivities.

There does not appear to be any central guidance on the quantum (MW or GW) of new renewable energy development each local authority needs to make provision for. A regional approach could provide that context. However, notwithstanding our strong belief in a holistic Regional Renewable Energy Strategy, Coillte recognises that time is of the essence. With this in mind, Coillte requests that each local authority in the Region incorporate a RES into the making/updating of its individual County Development Plan. Coillte is very familiar with Clare's current Wind Energy Strategy (WES) which was adopted into the current County Development Plan 2017-2023 and recognises the high quality of that document. However, given the new context in the Climate Action Plan and Programme for Government we suggest the WES will require updating and could form part of a wider RES for the county in the upcoming Plan.

In preparing a new RES each local authority should engage closely with neighbouring local authorities and with other local authorities in the southern region to strive to attain the same important benefits and synergies of a Regional RES. A regional steering group comprising planners from each local authority and potentially led by Clare planners and/or SRA, would be optimum. A representative from the DHPLG should also be requested to join the steering group.

Furthermore it is imperative that a set of guiding principles is agreed and used by all local authorities in developing local authority RESs. To this end the methodology and principles set out in "SEAI's Local Authority Renewable Energy Strategy" [2013] remain valid and should be considered.

[<https://www.seai.ie/publications/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf>].

This enhances the step by step approach to identifying wind energy zones in the 2006 WEGs, which have been transposed into the 2019 Draft WEGs document.

Based on Coillte's extensive experience of developing and facilitating wind farms in Ireland we suggest that the following recommendations complement the principles in the SEAI document:

- Each local authority ensures a proportionate contribution by the county to the achievement of new national targets. This could be done in a holistic manner via the Steering Group (referred to earlier). Regardless the individual County Development Plan's Strategic Environmental Assessment should use an evidence-based approach to confirm that the proposed contribution is sufficient to comply with each local authority's obligations in this regard. The level of contribution (ambition) will then dictate the criteria used in identifying lands for renewable energy.
- Each local authority carries out a full assessment of all lands within their county and classifies areas for renewables using terminology which is agreed in advance with the Steering group. Such terminology could include: 'No-Go', 'Open to Consideration', and 'Preferred' areas. It should be noted

that that the associated quantum of land identified as potentially suitable for renewable energy development must go beyond the actual amount required to be built in order to allow for a natural attrition rate across development sites, including for example landowners not choosing to develop, site level constraints arising at the detailed survey and design stage. If no such constraints exist, a project's planning application could still be refused permission, or if granted, overturned on judicial review. If granted permission, a project may not be able to secure an economically viable grid connection or be able to find a route to market for its electricity that make the construction of the project a commercially viable proposition. These are just a few examples of the hurdles a project must clear to convert theoretical potential to actual, delivered capacity.

- Each local authority consider/reconsider its Landscape Character Assessment (LCA) and identify landscape sensitivities vis a vis renewable energy developments. As above an approach and terminology should be agreed in advance with the Steering group. Such terminology could include 'Low', 'Medium', and 'High' sensitivity. It is likely it will be necessary to extend current areas suitable for renewables into slightly more sensitive landscape areas in order to deliver the requirements of the CAP. However this can still be done while protecting national, regional and locally important landscapes, particularly if a regional / steering group approach is adopted. It is critical that landscape policies and designations directly relate to renewable energy designations in order to provide a clear framework for development. Conflicts between general landscape policy and renewal energy designations are unhelpful.

It should be noted that turbine technologies have advanced significantly in the past decade and this trend is set to continue. For this reason we suggest the SEAI Wind Atlas, or any similar general wind resource data, is not used as a constraint when identifying suitable areas for on-shore wind. It should also be noted the SEAI Wind Atlas of Ireland is derived from a computer model and would not be as accurate as on-site wind measurements which are used by wind energy developers to verify a site's wind regime as being viable.

In addition, we recommend that existing grid constraints are not considered hard constraints when preparing RESs. This is because, amongst other things, the development of the Grid will react to (planning) consented developments where necessary. In essence this means that a planning consent, or indeed a critical mass of planning consented projects triggers grid development/reinforcement where necessary. This would mark a shift in terms of the existing approach in WES8.

This issue of existing grid availability was recognised in the SEAI [2013] document which suggested that "*local authorities may consider policies and objectives which could underpin and support infrastructure and network deployment to achieve national energy targets while realising local RE potential*". Coillte wholly supports the delivery and upgrading of grid infrastructure to facilitate Renewable Energy potential. The Southern RSES has

excellent policies in relation to grid development including RPO 96 and Coillte requests that these are mirrored in the Clare Development Plan.

The Draft Wind Energy Development Guidelines 2019 were also published last December by the Department of Housing, Planning and Local Government. These are likely to be finalised later this year. Specific Planning Policy Requirement (SPPR) 1 requires compliance with Section 3.4 which in turn says the Development Plan should set out the following: *“the identification on development plan maps of the key areas within the planning authority’s functions area where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle... open to consideration... generally discouraged.”* As SPPR1 is proposed to be a binding requirement of the Wind Energy Development Guidelines, it essentially requires the preparation of a Wind Energy Strategy. There is a need to review the current strategy to meet new national targets and an obvious opportunity to incorporate this as part of the new County Development Plan review process.

We recognise the scale of national ambition has increased significantly in the last 12 months and will continue to do so. This places further importance on the need for the new Clare Development Plan to prepare/update a RES and to bring forward progressive policies and objectives that ensure the County continues to fulfil its renewable potential, and to contribute proportionately towards national on-shore wind targets.

Coillte also requests that the Clare County Development Plan recognises the DHPLG Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.

Renewable Energy and Economic Growth

The Energy Sector is a key sector for job growth, throughout the lifetime of the Plan. Wind Energy development has the ability to generate significant construction and operation jobs throughout its lifetime and to contribute to communities through community benefit funds and to the local authority through rates.

In relation to communities Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports the development of local recreation amenities and provides additional community project funding. Community benefit schemes relating to RESS projects will have significant community benefit (circa €30k per annum per turbine for a 5 MW turbine; therefore exceeding €200k per annum in projects which are now typically exceeding 35MW in nameplate size), providing an opportunity to transform rural communities where projects are located. We are also working hard in the area of Community Investment and examining how communities could be given the opportunity to invest in a wind farm project.

Coillte is an active member of the Irish Wind Energy Association (IWEA) and our staff actively participate in a number of the Association's committees. IWEA statistics confirm that in terms of initial capital investment, every megawatt (MW) of wind energy capacity installed gives rise to an investment of approximately €1.25 million. Ongoing investment and economic development benefits during the 30+ year operational lifespan of wind farms, take the form of rents payable to landowners, financial support for local communities in the form of community benefit schemes and commercial rates payable to local authorities. Combined, these amount to approximately €25,000 per MW per annum.

Therefore, wind energy is of strategic importance to the county both in addressing Climate Change and in growing the Clare economy and providing employment opportunities.

Infinite Lifespan of Wind Farm Planning Permissions

Coillte also wishes to bring the Council's attention to IWEA's paper on 'Infinite Lifespan of Wind Farm Planning Permissions', (available at <https://iwea.com/images/files/final-paper-on-infinite-planning-duration.pdf>) and the fact that the majority of developments that obtain planning permission in Ireland are afforded a planning permission of infinite duration. However, despite there being no policy basis for this, it has been commonplace in Ireland for the life of a wind farm to be restricted by a condition of the planning permission.

Removing such conditions would enable wind farms to continue producing clean energy at a very low cost to the consumer, for as long as possible and continue to contribute via rates to local authorities. Wind energy is set to play a crucial role in helping Ireland to achieve its climate change targets and should not be treated as a temporary solution. Making this relatively minor amendment would save at least €1 billion for consumers under RESS alone while delivering the 70% renewable electricity target for 2030.

Currently, in order to continue operating beyond these limits, the wind farm operator would need to apply for planning permission for life extension (retaining existing turbines for a limited extended period) or for repowering (replacing older turbines with newer ones). This can be a costly and time-consuming process and it can be challenging to create a business case when seeking simply to extend the life of existing turbines for a limited number of years.

Notwithstanding the above, Coillte and IWEA recognise the importance of having decommissioning provisions in place for a wind farm when it does reach the end of its life. At a certain point it will no longer be viable to operate the wind farm, and in such cases, when the wind farm is no longer generating and exporting electricity to the grid, it should be decommissioned, and the turbines removed. To ensure that this is carried out in the correct manner, and that funds are allocated to cover these works; it is common for a wind farm planning permission to contain conditions that ensure that prior to construction the developer must submit a comprehensive decommissioning plan (which must be approved by the local authority) and a

decommissioning bond to cover the cost of the proposed decommissioning works, which could be triggered once the project has stopped exporting electricity to the grid. This provides the local authority with comfort that once the wind farm ceases operations, it will be properly decommissioned.

Working in Partnership on Wind Projects

The scale of the overall CAP ambition is considerable and requires considerable collaboration between all parties involved or associated with renewable energy including the communities that will ultimately host the infrastructure.

Coillte has an experienced team in the area of wind farm planning and development and is available to work in partnership with Clare County Council to support the realisation of the CAP targets.

As a semi state company, Coillte profits belong to the state and are returned by dividend to the shareholder on an annual basis. We operate a 'Fair Play Model' of engagement that commits to transparent dialogue and the sharing of information on an on-going basis with those most impacted by proposed developments.

2.4 Sustainable Timber Products

Timber is without doubt one of the most environmentally friendly and versatile building materials available and being a natural carbon sink can be considered truly renewable. Coillte requests that the Council promote the use of sustainable timber products in the forthcoming Clare County Development Plan.

3.0 Conclusions

Coillte welcomes the opportunity to make this submission to Clare County Council with respect to the making of the draft *Clare County Development Plan 2022-2028*. Coillte has engaged positively with the Clare County Council throughout the years and wishes to continue this important collaboration.

In preparing the draft Clare County Development Plan, Coillte requests that the Council:

- Continue to support sustainable rural based enterprises such as forestry and tourism in the county and make adequate provisions and objectives to facilitate their delivery.
- Have regard to the regulatory framework established under The Forestry Act 2014 and overseen by the Department of Agriculture, Food and the Marine with respect to the forestry sector.
- Ensure the zoning of sufficient lands with associated objectives for recreational, commercial, tourism, residential and community uses.
- Support the provision of residential and community based uses at appropriate locations within the county.
- Support the provision of accessible recreational, community and sporting facilities in the county.
- Support the provision of tourism infrastructure and visitor services, including the provision of tourism accommodation at appropriate locations in the Coillte estate.
- Promote the use of sustainable timber products in the Development Plan policies and objectives.

With respect to renewable energy, we believe that Coillte Forestry, Land Solutions and Renewable Energy businesses and Coillte Nature have the experience and expertise to support Clare County Council and the Southern Regional Assembly to realise one of the Region's key principles around climate action, namely "Climate action, by enhancing the climate resilience and accelerating the transition of the Region to a low carbon society."

In this regard, the following are key asks of the Local Authority in the preparation of the Clare Development Plan with respect to renewable energy:

- Include policies and objectives in the Plan that recognise, promote and facilitate on-shore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the most recent national targets.
- Recognise and respond to the scale and urgency of climate change as part of the County Development Plan review process by incorporating a Renewable Energy Strategy based on the new national targets and the principles of the SEAI LARES.

- Lead the Southern region in developing a consistent approach to key RES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speed, site specific engineering issues, and existing grid capacity issues are not considered constraints in identifying suitable lands, and ensure a sufficient quantum is identified to account for site level attrition.
 - Reconsider the attachment of conditions of finite duration to wind farm permissions.
 - Recognise the DHPLG Wind Energy Development Guidelines and any updates thereof, as the appropriate national standard rather than seeking to alter or replace the requirements therein.
 - Work in partnership with other government agencies and third parties, including the public, to achieve these goals.

If you have any queries in relation to any issues we would be happy to discuss. Please contact the undersigned.

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