

Wednesday, 23rd December 2020

Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth,
A91 W20C.

Submitted by email: louthcdp@louthcoco.ie

RE: DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

A Chara,

1.0 Introduction

Coillte welcomes the opportunity to make this submission to Louth County Council in response to the publication of the draft *Louth County Development Plan 2021-2027* published on 14th October 2020.

This section provides a summary of Coillte group; and thereafter provides a response to components of the draft Plan.

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, enabling a vibrant forest sector in Ireland which supports over 12,000 rural jobs 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.

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Coillte has approximately 900 employees across Ireland and the UK, and comprises four discrete businesses; 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 Louth. 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 Louth County Council on the draft Louth County Development Plan 2021-2027

2.1 Forestry, Tourism and Recreation

Coillte has a strong tradition of working with communities and stakeholders, including local authorities, and commits to working closely with Louth 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. Townley Hall, Slieve Foye Woods and Ravensdale forests are excellent examples of that cooperation and are popular visitor destinations in county Louth for locals and tourists alike. 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 and mountain bike trails where appropriate.

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.

As referenced in the draft Plan, 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.

It is noted 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.

In this context, Coillte supports the inclusion of reference to the regulatory framework established under the Department of Agriculture, Food and the Marine in the draft Plan. (Obj **ENV 30** and **ENV 31** refer).

Coillte supports the inclusion of forestry objectives, which seek to *“encourage forestry and forestry related developments as a means of diversifying from traditional agricultural activity”* (Obj. **ENV 32**); and which encourage access to forestry and woodlands (Obj **ENV 33**).

Coillte manages 1,704 hectares of forestry in County Louth, 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 Louth in a fully sustainable manner and to continue to work in partnership with the Council and other stakeholder groups within the county.

In this regard, Coillte is committed to protecting and enhancing the recreation infrastructure in County Louth with Townley Hall being an excellent recent example of this and to exploring the provision of further recreation infrastructure at appropriate locations in the Coillte estate, in partnership with Louth County Council and relevant stakeholders in the county.

Tourism and Recreation

The draft Plan includes a number of tourism policy objectives which identify the need for additional recreation tourism facilities and attractions in the county, facilitating the sustainable development of the tourism sector, including through the provision of enterprise developments in rural areas. (Obj. **TOU 4**, **TOU 17** and **TOU 18** refer). The draft Plan also supports the provision of “*appropriate and sustainable tourism development within forestry locations, while retaining adequate tree cover in the general area*” (Obj. **TOU 4**).

Located at a range of scenic locations in the county, including the strategically important Cooley peninsula, 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.

In this regard, Coillte supports the inclusion of policies and objectives in the *Louth County Development Plan 2021-2027* under which tourism/recreation facilities 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.

2.3 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 *Louth County Development Plan 2021-2027*.

3.0 Conclusions

Coillte welcomes the opportunity to make this submission to Louth County Council with respect to the making of the draft *Louth County Development Plan 2021-2027*. Coillte has engaged positively with the Louth County Council throughout the years and wishes to continue this important collaboration.

In preparing the County Development Plan, Coillte request 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.
- Continue to 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 and community uses.
- Support the provision of accessible recreational, community and sporting facilities in the county.
- Support the provision of tourism infrastructure at appropriate locations in the Coillte estate.
- Promote the use of sustainable timber products in the Development Plan policies and objectives.

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

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