

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

Submitted by email to: npf@housing.gov.ie  
Submitted on: 10th November 2017

Re: Response to National Planning Framework Consultation

To Whom It Concerns,

Fingleton White welcomes the opportunity to comment on the Draft National Planning Framework. Over the past 35 years we have grown to be the leading provider of engineers and project managers to the energy sector, in particular in relation to industrial-scale combined heat and power (CHP) plants. We have designed, built, operated, and maintained 70MW of CHP facilities and designed and built Biomass CHP projects. Using our knowledge and experience with industrial CHP systems we are now developing a Domestic CHP product for the home heating market.

The draft has put Sustainability and Climate Change Mitigation at the centre of the National Planning Framework. It highlights the challenge for Ireland of reduction of Green House Gas (GHG) emissions associated with providing heat and electricity to individual dwellings .

### **District Heating**

The draft recognises the role that district heating can play in five cities however no reference is made to addressing the legal barrier to the development of district heating which needs to be addressed.

The legal opinion is that anyone, statutory body, non-statutory body, or a private individual carrying out works on the public road, where land is registered to the centre of the road, has to obtain a wayleave/permission for those works from the registered landowner.

This in effect means that a developer who has planning permission and a road opening licence for a district heating system would also have to get permission to lay the pipes from all landowners whose title extends to the centre of the public road. A district heating project has the unacceptable risk of not being able to obtain the necessary landowner permissions and not having recourse to any powers of compulsory acquisition of land or right over land in respect of the construction or operation of the pipelines.

In order to facilitate development there are two options,

- New legislation
- Amendment to existing legislation which will give the Local Authority the full powers to determine what infrastructure can be installed in a road.

### **High Efficiency CHP**

We note that the draft makes one reference to High Efficiency Combined Heat and Power (HECHP) in the section on agriculture. The Energy Efficiency Directive 2012/27/EU puts CHP at the heart of the efficient use of energy.

Fossil fuels will continue to play a part during the energy transition but must be utilised in a more efficient way. Even with the most ambitious targets there will still be a need to use fossil fuels for heat, electricity and transport. It therefore becomes critical that these fossil fuels are used efficiently so as not to undermine the carbon reduction benefits that are gained from renewables.

As natural gas is the cleanest of the fossil fuels for both local air quality and global CO<sub>2</sub> emissions it is the obvious choice for electrical generation, heating and heavy goods transport during the energy transition. It is internationally traded and from geographically diverse locations including Ireland. The ability for LNG storage will ensure it meets the country's security of supply requirements into the future.

Burning the gas in an open cycle gas power plant will have an efficiency of less than 40%. If the gas is burned in a combined heat and power plant (CHP) then the efficiency would be over 80%. The heat, that would be otherwise wasted, can be used to support local industry and jobs. It is clear then that as fossil fuels are required in the energy transition their use should be prioritised in HE CHP plants where the environmental impact is minimised.

It is imperative that High Efficiency CHP is part of the National Planning Framework as there is a target of 800 MW in the National Energy Efficiency Action Plan (NEEAP).

### **Solar PV and Domestic CHP**

The rapid development in recent years in the fields of Solar PV and Domestic CHP systems have led to a significant reduction in the costs of these systems. These technologies when implemented in large volumes can reduce GHG emissions from individual dwellings and reduce our dependence on fossil fuel imports, which leads to a more competitive, sustainable nation.

In keeping with these developments, the electricity network has accommodated these technologies by simplifying the grid connection process for Micro generators, implementing a type approved, inform and fit policy, which is a welcome development.

However, there is currently no mechanism for these Micro generators to be paid for export electricity, even though the electricity has a value today. The reason that this electricity is currently given away for free by those that invest in this technology, is that the market has not kept up with technological developments. This has had a real impact on the deployment of these GHG reducing technologies.

Our energy markets need to develop to encourage people to implement these technologies. While the wholesale rate for electricity at today's prices would not be sufficient to make these technologies cost effective, access to this tariff in the long term to 2040 and beyond, would be a hugely significant signal to individual consumers and to the companies developing these products.

The wider benefit to society and the value to be attributed to the reduction of GHG emissions and imported fossil fuels, and how this value should be passed on to the consumer is beyond the scope of this consultation, but is something which must be addressed in parallel.

As our country moves to a low carbon economy, the electricity market must keep up with technological developments and provide the mechanism for individual Micro Generators to receive a payment for electricity exported to the National Grid.

### **Sustainable Low Carbon Transport - Pipelines**

Currently 16m tons of imports go through Dublin Port annually and are transported through Dublin City to various locations in Ireland. Over 20% of imports are petroleum products. This is a significant proportion of imports. Pipeline transportation is a viable option for these products and should form part of our plan for 2040.

Pipelines are widely used in the EU to support the efficient distribution of petroleum products. Ireland is a notable exception to the use of pipelines as a transport mode and are placed at a competitive disadvantage as a result of the lack of this key infrastructure. Pipelines have a long proven record as a safe, sustainable and efficient transport mode. Other benefits include reduced congestion and emissions when compared to HGV transport of petroleum products.

As an example, a pipeline from Dublin Port to Dublin Airport would replace current product deliveries by road of 0.5m tons by HGV vehicles. This new infrastructure will reduce current annual HGV trips by > 17,000 round trips (34,000 individual journeys). The forecast fuel demand at Dublin Airport is predicted to grow significantly leading to a growth in the number of HGV trips adding to traffic problems. An oil pipeline would reduce traffic, noise, emissions and congestion around the port, the airport and through the port tunnel. There are other strategic oil pipelines that could be developed which would reduce HGV journeys on the congested M50 by 200,000 journeys annually.

At present oil pipelines face the same legal barriers that have been discussed under the “District Heating” section above. Reform to legislation should cover all pipelines.

We trust the Department of Housing, Planning, Community and Local Government will consider the above, while developing a National Planning Framework and we would welcome the opportunity to discuss these issues with you at your convenience.

Yours Faithfully,



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Kevin Fortune