

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Customer House,
Dublin D01 W6XO

31 March 2017

RE: Consultation on the National Planning Framework

To whom it may concern,

Ervia plays a crucial role in our economy by managing and maintaining two strategic national utilities, Gas Networks Ireland and Irish Water. These national assets underpin the social and economic development of Ireland. As the provider of strategic infrastructure and services to some 0.7m gas and 1.7m water and wastewater customers in Ireland, Ervia welcomes the opportunity to respond to this important consultation.

Irish Water and Gas Networks Ireland have separately responded and provided comment on specific areas relating to their respective businesses. Ervia would like to make a number of more general comments on the National Planning Framework, as set out below:

1. Planning for national strategic infrastructure

As a small interconnected economy, Ireland must make prudent investment decisions when planning strategic national infrastructure. Where applicable, existing infrastructure should be further developed before investment is made in emerging technologies. Ervia believes that the National Planning Framework should maximise the potential of the national water and gas assets by:

- Supporting the development of a world-class water infrastructure to ensure secure and sustainable water services, essential for our health, the economy and the environment;
- Assisting Ireland in meeting its climate change targets by supporting decarbonisation policies to switch from high fossil fuels to the lowest, natural gas, in the medium term; and renewable gas and hydrogen in the long term.

Further, in considering the development plans and regional strategies, Ervia believes it is necessary to take into account the potential impact that large individual developments will have on the energy and water sectors and the wider economy.

2. Conduct solid macro-economic analysis to decarbonise at least cost

Decarbonisation of the energy market is one of the biggest challenges facing Ireland and Europe. Ireland, as a member of the European Union, has a target to achieve 16% renewable energy by 2020, which is proving difficult to meet. The EU target of 80%-95% decarbonisation by 2050 will also be a significant challenge for Ireland. Ervia believes that the most appropriate starting point in developing long-term energy policy (for infrastructure, financial and Government support) is to identify the least-cost route to compliance. It is incumbent on all parties involved in the energy sector to ensure that Irish citizens and energy consumers do not pay more than is absolutely necessary. Ervia recommends that the least-cost modelling carried out by UCC¹ for Ireland to meet its 2050 climate targets be considered as part of the National Planning Framework and that the infrastructure and sectors referenced within that document be supported.

3. Protect and develop our indigenous resources

Ireland has extensive natural resources which can be used to help decarbonise our economy. To date, much of the focus for energy has been on onshore wind. There are however many other natural resources which can be utilised for decarbonisation and which will bring the added advantage of supporting rural development. In particular, Ireland's agri-food and marine sectors can be developed for the production of renewable gas through sources such as farm waste, seaweed and wastewater. Ervia recommends that cognisance is taken of all such resources in developing the National Planning Framework.

The consultation recognises Ireland's unique environment in which water plays a critical role. Ervia is committed to maintaining and developing our water infrastructure and services to ensure they assist in protecting Ireland's natural environment. The National Planning Framework can assist Ervia and Irish Water in this role by supporting the objectives in our Water Services Strategic Plan.

Summary

Ervia recognises the requirement for, and the importance of, informed and strategic forward planning and we welcome the opportunity to respond to this consultation. We look forward to working with all stakeholders in developing Ireland's strategic gas and water infrastructures and in supporting social and economic development.

¹ <https://www.ucc.ie/en/energypolicy/blognews/fullstory-614715-en.html>