

County Development Plan Review,
Forward Planning,
Planning Department,
Roscommon County Council,
Aras an Chontae,
Roscommon.
F42 VR98

31st July 2020

Re: County Development Plan

To whom it concerns,

I have attached Gas Networks Ireland's response to the County Development Plan using the online portal. I attach this letter so you have my contact information.

Gas Networks Ireland would welcome the opportunity to discuss this response with you in more detail.

If you have any questions or require any clarification with regard to the attached consultation response please let us know.

Kind regards,

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Pre-Draft Public Consultation Roscommon County Development Plan 2021-2027

Roscommon County Council

Gas Networks Ireland Response

31st July 2020



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1 Introduction

Gas Networks Ireland (GNI) welcomes the opportunity to respond to the Roscommon County Council (the Council) 'Pre-Draft Public Consultation Roscommon County Development Plan 2021-2027'.

Connections to the gas network are limited in County Roscommon, however, GNI is involved in two initiatives which can benefit Roscommon from both an economic and environmental perspective:

- Development of renewable gas¹ injection infrastructure.
- Development of Compressed Natural Gas (CNG²) infrastructure for gas in transport.

GNI has provided comments and suggested text for inclusion in the County Development Plan below.

2 Consultation Comments

2.1 Rural Development and Natural Resources

Q. How can we strengthen our rural economies and communities?

The development of renewable gas production in the region will provide significant benefits to the local agriculture sector and strengthen the rural economy. Anaerobic digestion (AD) plants located in rural areas will provide additional revenue sources for these communities, from the sale of feedstocks for the AD plants, bio-fertiliser and renewable gas.

The development of renewable gas infrastructure in County Roscommon would support Regional Policy Objective (RPO) 8.7 in the Regional and Spatial Economic Strategy (RSES) for the Northern and Western Region³:

“Encourage and support innovative partnerships extending the gas network in the region, including the potential for gas to grid injection facilities along with anaerobic digestion facilities.”

Even though Roscommon currently has very limited natural gas infrastructure, renewable gas can to be transported by road to a central grid injection point. A virtual gas network may also be feasible which would supply renewable gas to significant energy users where it can be used in the same way as natural gas.

The SEAI estimates that stimulating a renewable gas industry in Ireland could lead to over 5000 jobs during plant construction and over 3000 jobs in plant operations⁴. With ongoing uncertainty regarding agricultural exports to the UK, post-Brexit supplementary income streams for farming are important. Crucially, as the AD process captures greenhouse gases, agricultural sector emissions are reduced that would otherwise be released to the atmosphere.

GNI suggests that the Rural Development and Natural Resources section of the new County Development Plan includes wording supporting renewable gas as follows:

¹ Renewable Gas: <https://www.gasnetworks.ie/corporate/company/our-commitment/environment/renewable-gas/>

² Compressed Natural Gas (CNG) is a fuel used in the transport sector which reduces transport emissions.

³ Regional and Spatial Economic Strategy for the Northern and Western Region: <https://www.nwra.ie/wp-content/uploads/2020/01/adpoted-rses.pdf>

⁴ SEAI, 2017 Assessment of Costs and Benefits of Biogas and Biomethane

“Renewable Gas

In rural areas there is potential to produce renewable gas from anaerobic digestion of organic wastes and residues from the agriculture sector and also from commercial food waste.

This gas could be transported by road to a central grid injection point or delivered to significant energy users for onsite consumption.

Renewable gas is carbon neutral and identical in function to natural gas so the existing network can be used and gas customers do not need to change their boilers or gas powered appliances.

There will be a presumption in favour of applications for anaerobic digestion plants, provided planning and environmental criteria are satisfied.”

2.2 Infrastructure Including Transport and Communications

Q. What infrastructure improvements do you think are necessary for the county?

The expansion of the gas network within the county would bring competitive advantages to the region. The secure supply of natural gas is in itself an important part of the suite of infrastructure necessary to assist in the improvement of regional accessibility generally.

The build-out of the gas infrastructure in County Roscommon would support the Regional and Spatial Economic Strategy (RSES) for the Northern and Western Region⁵:

“RPO 8.5: To support the build-out of the gas supply network into Counties Sligo, Roscommon, Donegal and Leitrim and in additional locations in the remainder of the region”

“RPO 8.6: Facilitate the delivery and expansion of natural gas infrastructure throughout the Region and have regard to the location of existing gas infrastructure in assessing potential developments”

The development of the gas network will not only support large energy users to reduce emissions by converting from heavy fuel oil to gas, it will also facilitate the use of renewable gas and compressed natural gas (CNG) within the county. Carbon emissions are a key issue to be addressed in transport with Heavy Goods Vehicles (HGVs) in particular being responsible for a disproportionate amount of transport emissions. They comprised 4% of registered vehicles nationally in 2018, however, SEAI estimates indicate that they produced 14% of total transport emissions.

Decarbonisation of HGVs and buses is particularly challenging as electricity is currently not a viable alternative to diesel. Compressed Natural Gas (CNG) is a potential option which delivers reduced carbon emissions relative to diesel. When the production of renewable gas is increased on the gas network, and utilised by CNG vehicles as bio-CNG, carbon neutral transport can be achieved.

GNI suggests that wording is included in the Infrastructure Including Transport and Communications section to detail CNG in transport:

“Compressed Natural Gas (CNG)

CNG is natural gas that has been compressed to fit into a vehicles’ tank and is particularly suitable for use in commercial vehicles.

⁵ Regional and Spatial Economic Strategy for the Northern and Western Region: <https://www.nwra.ie/wp-content/uploads/2020/01/adpoted-rses.pdf>

The development of CNG Infrastructure will enable fuel switching from diesel to CNG for heavy goods vehicles (HGVs) and buses, as electricity is currently not a viable alternative to diesel. CNG is an established technology that is used in many countries around the world.

CNG produces less carbon emissions than diesel and leads to improved air quality with 99% less particulate matter, 70% less Nitrogen Oxide, and 80% less Sulphur Dioxide.

CNG vehicles can be run on 100% renewable gas. This is a clean, renewable and carbon neutral fuel, produced using Anaerobic Digestion (AD) technology from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste.

Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study⁶ that is supported by the European Commission through the CEF Transport Fund⁷ and the Commission for Regulation of Utilities (CRU).

The Council will support the usage of CNG vehicles by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied.”

The development of CNG in transport supports the ‘National Policy Framework Alternative Fuels Infrastructure For Transport In Ireland⁸’ which sets out a target of 70 CNG fuelling stations by 2025.

2.3 Climate Action, Energy and Environment

Q. What forms of renewable energy should be facilitated in the county?

The production of renewable gas should be facilitated in County Roscommon which will lead to a reduction in greenhouse gas emissions. The use of CNG in transport will provide a pathway for the use of carbon neutral bio-CNG with improved local air quality, as outlined in sections 2.1 and 2.2 above.

Careful consideration should be given to any investments being made to transition to a low carbon society. Funds should be spent on the least cost method to ensure the best value for Ireland. Any technologies considered should be subject to full life cycle assessments.

2.4 Built Heritage and Natural Heritage

GNI is cognisant of the natural environment with an ongoing commitment to biodiversity and archaeology. Transportation of gas is unobtrusive with care taken to minimise the impact on local flora and fauna during any construction and development activities. A partnership approach with environmental and heritage groups is used on all construction projects. Engineers and environmental specialists are employed to carry out assessments at the planning and construction phases of developments. GNI returns all land to its original state following construction.

3 Conclusion

GNI asks that Roscommon County Council considers the above comments and would welcome the opportunity to discuss this response in more detail.

⁶ Causeway Study: <https://www.gasnetworks.ie/business/natural-gas-in-transport/the-causeway-project/>

⁷ CEF Transport Fund: <https://ec.europa.eu/inea/en/connecting-europe-facility/cef-transport>

⁸ National Policy Framework Alternative Fuels Infrastructure For Transport In Ireland
<https://assets.gov.ie/26377/3075c29a37b84b10acae95da89d756ea.PDF>