



Draft NECP 2021-2030 Consultation,  
Strategic Energy Policy Division,  
Department of Communications, Climate Action & Environment,  
29-31 Adelaide Road,  
Dublin 2, DO2 X285

18<sup>th</sup> February 2019

## **Submission from the Western Development Commission to the Draft National Energy and Climate Plan 2012-2030**

The Western Development Commission (WDC) would like to take the opportunity to make some brief observations on the Draft National Energy and Climate Plan 2012-2030 (NECP).

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region<sup>1</sup>. It operates under the aegis of the Department of Rural and Community Development. The Western Region is very rural with almost two thirds of the population living outside of settlements of 1,500. Thus rural issues, rural development and the needs of peripheral areas are key concerns of the WDC.

The WDC regards the development of clear energy and climate action policy as essential to achieving the national goal of a low carbon economy in Ireland by 2050. We recognize that this will bring important opportunities for our largely rural region, but at the same time it will bring challenges that we would wish to see addressed in the NECP. The WDC made a detailed submission to the previous consultation on the draft NECP (November 2018)<sup>2</sup>, therefore in this submission we only address specific issues arising from this draft of relevance to our region and our remit.

### **General Comments**

The NECP usefully brings together and summarises relevant current energy and climate policy. However, much of the focus is on current policy and, while there is a recognition that it will be difficult to meet targets with the policy that is currently in place, there is little information about the additional policies or regulations which will be needed to ensure we achieve targets.

While the plan recognises (pg 4) that heating is a particular issue in rural areas there is no specific commitment or policy to address the needs of rural areas either in relation heating or transport. Nor is there a recognition that there are unique opportunities for rural areas from the low carbon economy. We believe

---

<sup>1</sup> The Western Region comprises counties Donegal, Sligo, Leitrim, Mayo, Roscommon, Galway and Clare. For more information about the WDC please see [www.wdc.ie](http://www.wdc.ie)

<sup>2</sup> <https://www.wdc.ie/wp-content/uploads/wdc-response-initial-ncep-consultation-12.11.18.pdf>

that specific rural focused policies could be introduced for this. This would have benefit both in terms of achievement of EU targets and in relation to the development of the rural and regional economies.

Similarly the NECP acknowledges that the dispersed population pattern results in particular challenges in terms of transportation options. Again there is no specific commitment or policy to address the needs of rural areas. The *National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland 2017-2030* notes that it is likely that in future electricity will fuel the majority of passenger cars, commuter rail and taxis while natural gas and biofuels will play an increasingly important role for larger vehicles like HGV and buses. While we would agree with this, we believe that services such as EV charging points and CNG fueling points must be widely available in rural areas where population is dispersed. Without these services being available and reliable, it deters rural dwellers from adopting the new technologies and will deter visitors who might be concerned about the availability of charging/fueling points. In the case of HGVS and buses could increase costs of delivery or services in more rural and peripheral regions.

### Other issues

- **CAROs.** We welcomed the establishment of the Climate Action Regional Offices (CAROs) and believe that they will help to focus on local issues. However, their main focus seems to be on climate adaptation and it is important that they have a broader focus on regional mitigation.
- **All of Government Plan:** we very much welcome this proposed plan believe it has the potential to focus on adaptation and mitigation and renewable energy for rural dwellers.
- **Target Emissions:** Under the EU Reference Scenario oil price, it is calculated that ESR emissions in Ireland (i.e. emissions outside the EU ETS) would be 41.12MT under the With Additional Measures scenario. This is more than 7MT over the EU target for Ireland. The additional measures as outlined in the NECP are broad and they, of course, target the areas where the easiest transformations can be made. To achieve the target, however, there also needs to be a focus on issues which are less easily addressed such as mitigation, renewable energy and the development of a low carbon economy in rural areas.
- **Use of Flexibilities** while the use of flexibilities seems to bring target emissions down from 30% to 20.4% the consequences of the use of these flexibilities on ETS and on changes under LULUCF need to be made clear.
- **Afforestation and Soil Carbon:** Ireland will have access to a flexibility of 26.8 MT of removals from LULUCF (under afforestation, net of deforestation, is forecast to contribute 22 MT with 4.8 MT forecast to come from increased soil carbon in cropland and grassland over the period 2021-2030). It would be useful to have more information on this and it is also necessary to consider whether the afforestation targets can be met with current policy, particularly where there is concern about significant afforestation in a landscape. There is a need to consider forestry policy and involvement of community and community benefits (access, walks etc.) to make it more acceptable. The draft NECP does not outline how the increased soil carbon will be achieved.
- **Warming:** the increase in number of warm days (Table 7 p68) will change payback period and savings for those thinking of changing their heating systems. It is assumed that this has been included in the modelling. As Ireland has a mild climate the returns on investment in heat systems are less than in colder climates so it will be more difficult or more costly to encourage change.
- **Electricity transmission network** (p100 and p110): In relation to the development of the network there is no mention of West (high need for grid development), North West (high need for grid development) and Midland (moderate need for grid development) issues noted by EirGrid in the

recently published Systems Needs Assessment (Nov 2018). These need to be included. A study recently commissioned by the WDC<sup>3</sup> reviewed the transmission network and current planned renewable generation to identify areas of the Western Region that have transmission capacity for new renewable generation. It found that North Mayo/West Sligo and Co. Donegal have no capacity for new generation without substantial transmission investment. Sligo/Leitrim, South Mayo and West Galway has limited capacity and will require transmission investment in the future. The WDC believes that significant investment is needed in these areas, so that the needs of current and contracted renewable generation are met AND that there is potential for further future connections to ensure areas of best resource can produce most.

- **Gas transmission network:** There is a need to review the natural gas network coverage to ensure that it is future proofed to meet the needs of all key urban centres (currently large settlements such as Sligo and Letterkenny are not connected). There is important potential for decarbonisation in the gas network, though the future use of biogas, and through the transmission of gas for CNG refuelling. There are also economic benefits for urban centres which are connected to the natural gas network. In the context of the NECP a review of the broader government criteria of developing the transmission network should be reviewed. This should include information from the study of wider benefits of connecting regions to the natural gas which has been undertaken for DCCAE but which has not been published.
- **Electric Vehicles (p110):** We welcome the target of 500K EVs by 2030 but to help achieve this charging investment needs to be early and widespread. This will not just benefit those living in rural areas but will be important for those for those visiting for business or pleasure. Lack of charging points could in future become a disincentive for visitors and could further concentrate tourism in areas near larger urban centres. A good charging network on the Wild Atlantic Way and other tourist routes should be immediate priorities.
- **Electricity generation (p119):** The key measures for electricity generation outlined here are quite weak. It should be noted that when bioenergy (especially biomass) is used in generation CHP is most efficient but it is important to have a use for the heat, District Heat Networks can play a role here.
- **Built environment (p119- 120):** We agree energy efficiency is important and welcome the ambition to increase the number of homes with a BER rating of B and above. However, the most recent BER ratings data from the CSO shows that currently only 15% of homes assessed nationally have a rating of B or above. In the Western Region only 10% achieve this and it is as low as 7% in Roscommon. This highlights the need to specifically address energy efficiency and home heating issues in more rural and less well-off regions. For dwellings in the in lowest rating categories and the costs and difficulties of achieving upgrade to a B rating are most significant.
- Most homes in our region use oil for heating. There needs to be a specific effort to encourage change in rural areas which are oil dependent. While many of the incentives are for the installation of heat pumps it should be remembered that the use of wood biomass for heating brings very significant local economic benefits.
- **Transport (p120-121):** It should be remembered that employment is only one factor generating trips and the majority of travel is associated with non-work trips. The importance of these non-work trips and the potential for change in this demand needs to be more central to climate action planning.
- Rural people are more reliant on car based transport, they have less available public transport and tend to travel greater distances. Therefore clearly rural dwellers' transport demand patterns need to

---

<sup>3</sup> <https://www.wdc.ie/wp-content/uploads/wdc-insights-electricity-december-2018.pdf>

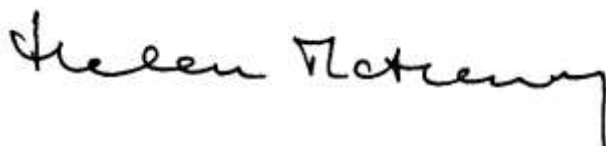
be central to planning for climate action. There must be detailed consideration of transport issues for smaller settlements and rural areas. The majority of the population will continue to live in the historical settlement pattern and spatial planning will not change that pattern significantly to 2030 or even in the longer term (to 2050). Thus the NCEP needs to focus on current spatial patterns.

- **Renewable Energy** (p136): The draft NECP notes that the Support Scheme for Renewable Heat 3<sup>rd</sup> phase may include support for biomethane injection. This is welcome but it should be remembered that the large towns of Sligo and Letterkenny don't have access to the gas grid. They will therefore not be in a position to benefit from this so it is important to consider how issues in areas like these can be addressed.
- The focus on **micro generation** (p 141) is welcome but the policy has to be to be fair in terms both of impact on PSO and also in considering how supports should not only benefit those who can afford to be involved and make the capital investment.
- **Low Emission Vehicles** (p145-146). In relation to refuelling of low emission vehicles it is important that there is a focus on the wider transport network, including the Comprehensive TEN-T network and beyond, and not just on the Core Ten T routes. It is important not to exclude other areas which often have significant freight transport needs (e.g. pharma products from Mayo, fish from remote harbours). Without an extensive investment in the low emission refuelling network (whether CNG, biofuels or EV charging) more peripheral and rural areas will be further disadvantaged in terms of their infrastructure and the competitiveness of their businesses.

In conclusion, the WDC believes that it is essential that part of the NECP should have a specific focus on issues for rural areas, and actions to ensure that rural areas are both in a position to benefit from a move to a low carbon economy (and there was many opportunities for them to do so) and also that rural dwellers make a fair contribution other national goals in relation to renewable energy and to our actions to mitigate climate change.

The WDC is pleased to make this submission to DCCA on the National Energy and Climate Plan (NECP). If there are any queries in relation to this submission, please contact me.

Yours sincerely



---

Dr Helen McHenry  
Policy Analyst  
Western Development Commission

[helenmchenry@wdc.ie](mailto:helenmchenry@wdc.ie)

T: 094 986 1441

M: 086 605 3264