

# ***Consultation on the Potential for Extending the Natural Gas Network in Northern Ireland***

***Comments by***

**Northern Ireland Environment Link**

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 55 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

Prof Sue Christie, Director  
Northern Ireland Environment Link  
89 Loopland Drive  
Belfast, BT6 9DW  
P: 028 9045 5770  
E: [Sue@nienvironmentlink.org](mailto:Sue@nienvironmentlink.org)  
W: [www.nienvironmentlink.org](http://www.nienvironmentlink.org)

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NIEL is supportive of the objectives of the Strategic Energy Framework and is particularly keen to see the development of indigenous renewable energy sources to improve Northern Ireland's energy security and as a counterbalance to the effects of peak oil and other financial drivers for increasing energy costs. Gas is a fossil fuel and therefore should be a minor portion of the future energy mix; however as the least polluting and one of the most efficient fuels it does have a role in the short to medium term.

We strongly support the importance of an integrated approach to energy planning with renewables as a driver of this. In line with the UK Renewable Energy Roadmap, the Department should be developing a framework for energy development that considers the need and appropriateness of different energy sources across Northern Ireland. The Northern Ireland Executive has a target to deliver 40% renewable electricity and 10% renewable heat by 2020. Should the proposals of the consultation document be implemented there is likely to be conflict and difficulty in reaching the set targets for renewables across Northern Ireland. The extension of the gas network is sending a mixed message to the public and if consumers spend money to convert their energy supply to gas this will deter any further adjustment to renewable technology. This policy is also somewhat contradictory to DETI's ongoing consultation on the Renewable Heat Incentive as in promoting renewables the department is not giving a clear indication of its policy priorities – and reiterates the need for integrated energy policy guidance. Research carried out in the west of Ireland has shown that that extension of the gas network is not an effective measure to reduce greenhouse gas emissions and we hope that the department will consider this before advancing the current proposals.

Collaboration between the North and South of Ireland is vital to provide an integrated approach to environmental matters. An all-island context should be incorporated in any guidance on energy development as a much more efficient system of infrastructure and distribution can be established. For example, the potential to extend the gas network from the south of Ireland may be a feasible option to border areas such as Derrylin that have high industrial and commercial demand and existing infrastructure could be utilised. There are many opportunities to develop an integrated energy framework across the island of Ireland to create greater efficiency and ensure the most cost-effective and reliable mix to maximise sustainable energy resources on both sides of the border.

As gas is a preferred fuel to coal or oil there may be potential to develop the network where there is an available supply and therefore focus on incentivising connections in the area to maximise the full potential of the existing infrastructure as a priority; however, this must be feasible and fit with an overall framework to facilitate renewable energy development and supporting grid infrastructure. Natural gas does remain a polluting non-renewable fuel and although cleaner than coal or oil it is not a long term sustainable energy source to build an extensive infrastructure network around. Any extension to the existing network should be minimal and have a clear evidence-based rationale, which has not been demonstrated fully in the consultation report.

The document causes some concern in relation to funding of the proposed extension. It is apparent that the consumer will face further increases in their energy bills and there will be

inevitable impact on the challenging fuel poverty statistics that we are currently facing as both gas and electricity prices are affected. More information is needed in terms of the economic justification for the proposed network extensions and likely delivery as part of a wider framework. Investment in energy development is more critical now than ever to meet EU targets, address fuel poverty and ensure security of supply within the limitations of a difficult fiscal climate. Energy development should be regarded as an opportunity for Northern Ireland to share in future prosperity arising from the development and marketing of associated new technology. We should be investing in our future energy supply to reap the rewards locally in the future instead of paying rising costs to energy suppliers, often overseas. It is important to consider Northern Ireland's dependency on natural gas imports as price cannot be controlled and reliability is not secure with limited gas storage facilities in the region. Careful planning and coordination of an integrated energy framework will consider a shift to a more decentralised model of supply to maximise renewable energy potential in alignment with the UK Renewable Energy Roadmap.

In conclusion, we believe that limited extension of the gas network may be useful, but that any extension should not divert funding or effort from pursuing indigenous renewable development. If possible the gas network should allow for integration with future renewable production.