

Gas Network Ireland

Network Development Plan 2024

Screening for Appropriate Assessment

Reference: Issue

2 | 21 February 2025

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 292976-00

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1. Introduction

1.1 Overview

This report contains information for a Screening for Appropriate Assessment (AA) on a National Development Plan (hereafter referred to as the draft Plan) currently being developed by Gas Network Ireland (GNI) for 2024. Arup have been commissioned by GNI to prepare a Screening for AA report to assess the potential for likely significant effects arising from the draft Plan.

The draft Plan is an annual rolling document prepared by GNI each year, which provides a view of how the gas network may develop over a ten-year period.

1.2 Purpose of the draft NDP

The draft Plan covers the gas network system operated and maintained by GNI and sets the scene for the future gas network and how it may develop over from 2023/2024 to 2032/2033 Based on current supply and demand for gas, as well as projected changes in gas consumption and development of infrastructure. The draft NDP is a strategic plan which is high-level and strategic in nature.

1.3 Basis for Appropriate Assessment

The Habitats Directive on the conservation of natural habitats and wild fauna and flora (92/43/EEC) (the ‘Habitats Directive’) provides the legal protection for habitats and species with Article 3 to 9 providing protected sites which comprises Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and proposals for such sites (referred to as European sites).

Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans and projects likely to affect European sites. Article 6(3) establishes the requirement for AA whilst Article 6(4) sets out the Alternative Solutions, Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures where adverse effects on the integrity of European sites cannot be excluded.

The Habitats Directive has been transposed in Ireland by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011) (as amended), with an application made under section 177AE of the Planning and Development Act, 2024.

Under the Planning & Development Act 2024 (as amended), prior to submitting for approval a project or plan that is not directly connected with or necessary to the management of either a candidate SAC, candidate SPA, SAC or SPA, competent authorities are required to consider whether the plan may have a significant effect on such a site; and where this is the case, that an AA of the implications of the project or plan must be carried out.

1.4 Statement of Competency

The statements of competencies for the contributing authors to this AA report are provided in Appendix A adjoining this report.

1.5 Layout of Report

This report is structured as follows:

- Section 2 presents the methodology, guidance and data sources used to inform this AA Screening;
- Section 3 provides context of the draft Plan;
- Section 4 provides the Screening for AA utilising the Source-Pathway-Receptor method to establish the Zone of Influence and identify European sites with potential likely significant effects; and
- Section 5 presents the summary, conclusions, and recommendations of this Screening for AA report.

2. Methodology, Guidance and Data Sources

2.1 Screening for Appropriate Assessment Process

The Office for the Planning Regulator¹⁹ (OPR) provides guidance on the Screening for AA process and is defined below in Figure 1:

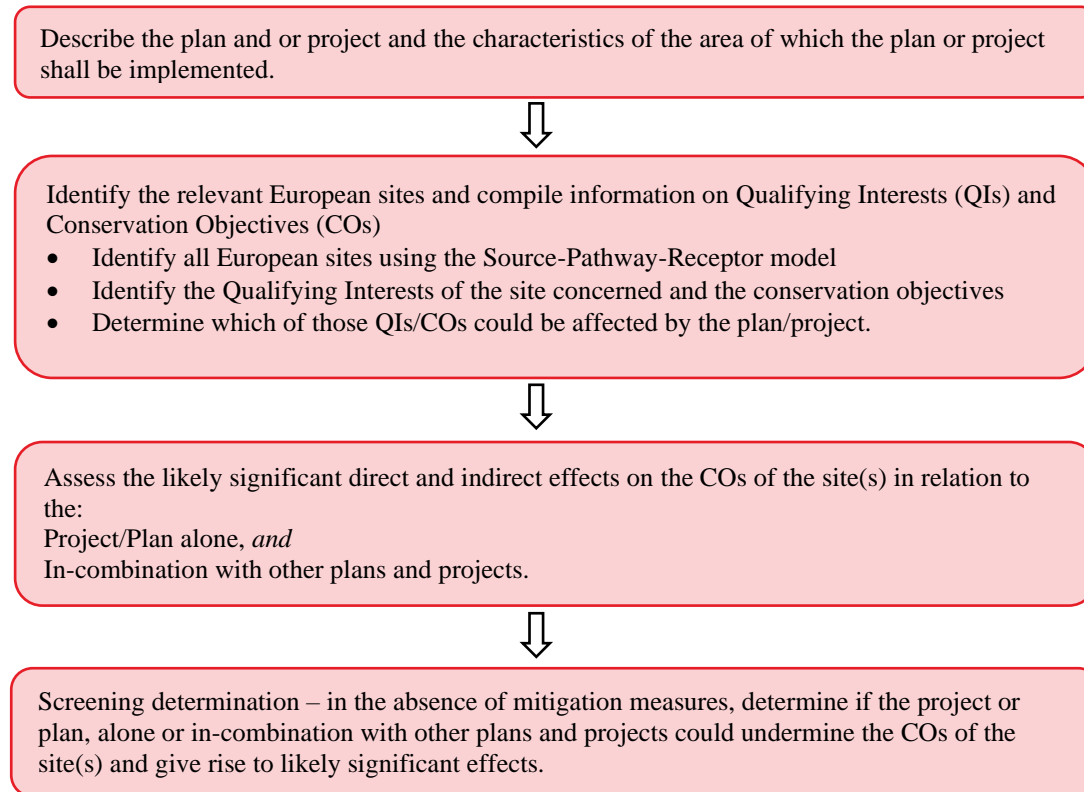


Figure 1: Screening for Appropriate Assessment Process

There are “*Cases where no Appropriate Assessment issues arise*” and as outlined within the guidance from the OPR. This is where the plan or project ‘*could not have any conceivable effect on a European site. For example, where the nature, scale, timing, duration and location of a development is entirely unconnected to a European site*’. The guidance further states that “*The project should only be considered to have no appropriate assessment issues if it is obvious that the entire project, through all of its stages, could not possibly have any effect on any European site, and that no measures intended to avoid or reduce potentially harmful effects on a European site are included*”.

The aforementioned process and guidance have been considered as part of this report.

2.2 Definitions

The definition of a ‘plan’, as defined within the Planning and Development Act 2024.

2.2.1 A plan

“‘Plan’, subject to exclusion, except where the contrary intention appears, of any plan that is a land use plan within the meaning of the Planning and Development Act 2024 includes:

(f) a development plan or a variation of a development plan;

(g) an amendment to a development plan as provided in subsection (2) of section 62.”

2.2.2 European Sites

European sites, as defined under the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477/2011) (as amended) are part of the Natura 2000 network and include those designated as SACs, candidate SACs (cSACs), SPAs or proposed SPAs (pSPAs). These are sometimes referred to as Natura 2000 sites.

SACs are selected for the conservation of Annex I¹ habitats (including priority types which are in danger of disappearance) and Annex II² species (other than birds) as defined by the respective annexes of the Habitats Directive.

SPAs are selected for the conservation of Annex I birds and all migratory birds and their habitats as defined by the respective annexes of the Birds Directive.

The Annex habitats and species, for which each site is selected, are termed the Qualifying Interests (QI) for SACs and termed Special Conservation Interests (SCI) for SPAs of each site.

2.2.3 Conservation Objective

Conservation Objectives (COs) for the European sites are defined for the relevant QIs and SCIs. In its most general sense, a CO is the specification of the overall target for the species and/or habitat types for which a site is designated in order for it to contribute to maintaining or reaching favourable conservation status³.

The COs for a given site are underpinned by a list of attributes and targets for each QI/SCI, with those targets needing to be reached to maintain or restore favourable conservation condition of each QI/SCI

2.2.4 Source-Pathway-Receptor Model

The Source-Pathway-Receptor model is used to assess where a potential effect may result by examining the source, its pathway and the receptor. As per guidance from the OPR⁴ these can be defined as follows:

- **Source:** The origin of a potential effect which may include characteristics of a plan or project that have the potential to result in effects e.g. direct impacts such as loss of habitat;
- **Pathway:** How the potential effect may occur on the source. These are identifiable through linkages that may occur through the plan or project and European sites e.g. direct pathways such as physical proximity, hydrological connections or indirect pathways such as disturbance to migrating species; and
- **Receptor:** The European site network and respective QIs/SCIs, their ecological condition and sensitivities e.g. freshwater pearl mussel is sensitive to siltation in water.

2.2.5 Zone of Influence

A Zone of Influence (ZoI) within any assessment of projects and/or plans considers the area over which ecological features may be affected by biophysical changes as a result of the proposed plan/project and associated activities.

2.3 Guidance

The following guidance was used in carrying out the Assessment:

- Assessment of plans and projects in relation to Natura 2000 Sites: Methodical guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission Environment Directorate-General, 2021);
- Communication from the Commission on the precautionary principle. European Commission (2000);

¹ Annex I habitats are habitats whose conservation requires the designation of Special Areas of Conservation

² Annex II species are animal and plant species whose conservation requires the designation of Special Areas of Conservation

³ Commission Note on Setting Conservation Objectives for Natura 2000 Sites (November 2012) European Commission, Doc. Hab.12-04/06. Accessed at: http://ec.europa.eu/environment/nature/natura2000/management/docs/commission_note/commission_note2_EN.pdf

⁴ OPR (2021) Appropriate Assessment Screening for Development Management. OPR Practice Note PN01

- Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC (European Commission, 2007);
- Guidelines for Good Practice Appropriate Assessment of Plans under Article 6(3) Habitats Directive (International Workshop on Assessment of Plans under the Habitats Directive, 2011); and
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC (EC Environment Directorate-General, 2019).

Republic of Ireland specific:

- Office of the Planning Regulator Practice Note PN01 - Appropriate Assessment Screening for Development Management (OPR, 2021);
- Strict Protection of Animal Species Guidance for Public authorities on the Application of Articles 12 and 16 of the EU Habitats Directive to development/works undertaken by or on behalf of a Public authority (NPWS 2021);
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (Department of Environment, Heritage and Local Government, 2010 revision); and
- Appropriate Assessment under Article 6 of the Habitats Directive; Guidance for Planning Authorities. Circular National Parks and Wildlife Service (NPWS) 1/10 and PSSP 2/10.

Northern Ireland specific:

- Guidance explaining The Conservation (Natural Habitats, etc.) (Amendment) (Northern Ireland) (EU Exit) Regulations 2019

The requirements for Screening for AA, and AA, for European sites, are set out in Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. 477 of 2011) with numerous relevant rulings and opinions issues in both Irish and EU courts. AA is a process required under Article 6(3) of the EU Habitats Directive as transposed by the aforementioned Regulations.

2.4 Data Sources

The ecological data reviewed to inform this report comprises:

- Environmental Protection Agency (EPA) Map Viewer⁵;
- EPA- Ireland's Environment. An Integrated Assessment 2020 Article 12 web tool⁶;
- Joint Nature Conservation Committee UK Protected Areas⁷;
- Northern Ireland Environment Agency (NIEA) Protected Areas web viewer⁸;
- NPWS (2023) Conservation Objectives Series⁹;
- NPWS (2023) SAC and SPA Datasheets¹⁰;
- National Parks and Wildlife Service (NPWS) Designations web viewer¹¹;

⁵ EPA Map Viewer accessed at <https://gis.epa.ie/EPAMaps/> accessed January 2025

⁶ Article 12 of the Birds Directive Web tool accessed at <https://nature-art12.eionet.europa.eu/article12/> accessed January 2025

⁷ JNCC Protected Areas web viewer accessed at <https://jncc.gov.uk/our-work/uk-protected-areas/> accessed January 2025

⁸ NIEA Protected Areas web viewer <https://gis.daera-ni.gov.uk/arcgis/apps/webappviewer/index.html?id=bb721449cb8949e7a4f90c722bd2d80b> accessed January 2025

⁹ NPWS Conservation objectives accessed at <https://www.npws.ie/protected-sites/conservation-management-planning/conservation-objectives> accessed January 2025

¹⁰ NPWS SAC and SPA Datasheets accessed at <https://www.npws.ie/maps-and-data/designated-site-data/sac-and-spa-datasheets-downloads> accessed January 2025

¹¹ NPWS Designations web viewer accessed at <https://dahg.maps.arcgis.com/apps/webappviewer/index.html?id=8f7060450de3485fa1c1085536d477ba> accessed November 2023

- NPWS Protected Sites in Ireland¹²;
- NPWS The Status of EU Protected Habitats and Species in Ireland Web Viewer¹³;
- The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report¹⁴. NPWS (2019);
- The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report¹⁵. Edited by: Deirdre Lynn and Fionnuala O’Neil. NPWS (2019); and
- The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report¹⁶ (2019). Edited by: Deirdre Lynn and Fionnuala O’Neill (2020).

¹² NPWS Protected sites accessed at <https://www.npws.ie/protected-sites> accessed January 2025

¹³ NPWS The Status of EU Protected Habitats and Species in Ireland web viewer accessed at <https://storymaps.arcgis.com/collections/1a721520030d404f899d658d5b6e159a> accessed January 2025

¹⁴ The Status of EU Protected Habitats and Species in Ireland: Volume 1 Summary Overview accessed at https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf January 2025

¹⁵ The Status of EU Protected Habitats and Species in Ireland. Volume 2: Habitat Assessments. Unpublished NPWS report https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol2_Habitats_Article17.pdf January 2025

¹⁶ The Status of EU Protected Habitats and Species in Ireland. Volume 3: Species Assessments. Unpublished NPWS report accessed at https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf January 2025

3. The draft National Development Plan

3.1 Overview

The purpose of the draft Plan¹⁷ is to assess the network’s current capacity based on existing forecasts and supply and demand in order to guarantee the adequacy of the gas transportation system and security of supply. The draft Plan covers from 2023/2024 to 2032/2033 inclusive.

3.2 Gas Demand Forecasts

Due to the broad scope of input assumptions and the considerable uncertainty in the trajectory of gas demands in Ireland over the draft Plans timeframe, GNI have developed three scenarios; a low, best estimate and high gas demand scenarios. The scenarios aim to capture the potential impact on both annual and peak day gas demand with a view to ensuring adequate capacity on the gas network to meet customer demand.

The scenarios aim to capture the projected demand across power generation, industrial, commercial, residential and transport sectors. The increase of renewable power generation and residential uptake of low-carbon and renewable heating technologies has been considered in the development of each scenario.

The low demand scenario anticipates a decrease in ROI gas demand by 49% over the draft Plan timeframe. Over the same timeframe the best estimate scenario annual ROI gas demand is expected to fall by 14%. Contrarily, the high demand scenario forecasts an increase in annual ROI gas demand of 16%.

Table 1 summarises the projected demand over the draft Plans timeframe, across each sector, under the three scenarios.

Table 1: Summary of Forecasted Demand across each Scenario per Sector

Sector	Scenario	Forecasted demand
Power generation	Low demand	The Low gas demand scenario meets the ambitious Climate Action Plan (CAP) 2024 renewable capacity target of 22GW in 2031, growing to 26.8GW in 2033
	Best estimate	Power Generation sector annual gas demand is expected to decrease by 27%
	High demand	Projected ROI demand growth out to 2032/33 is driven by growth of 16% in Powergen demand
Industrial & Commercial	Low demand	Decrease of 4%
	Best estimate	Growth in demand of 11%
	High demand	Growth in demand of 19%
Residential	Low demand	Reduction in demand of 47%
	Best estimate	Reduction in demand of 26%
	High demand	Reduction in demand of 6%
Transport	Low demand	Demand of 360GWh/yr (increase)
	Best estimate	
	High demand	Demand of 1,150GWh/yr (increase)

¹⁷ Gas Networks Ireland (2024) National Development Plan. Accessed January 2025

3.3 Gas Network Capacity

As part of the forecast modelling, GNI compares the forecasted demands, and the forecasted supplies, of the draft Plan. This section of the draft Plan provides information on planned capital investment and future investment proposals for transmission system projects in order to comply with statutory and regulatory requirements. Whilst the draft Plan contains detail in regard to the GNI network, assets, future demands and potential prospects for the future, it does not contain any detail which has been identified as an action, target, measure or material considered to require development consent.

The draft Plan states, that the best estimate 1-in-50 peak day¹⁸ demand is forecasted to surpass the current combined system entry capacity for the last eight years of the draft Plan timeframe. The draft Plan explains that 10 projects were completed in 2022, including 2 AGI Capacity Upgrades, and 8 Reinforcements of the Distribution Network.

This includes a series of capacity upgrade works at compressor stations in Scotland, located at Brighthouse Bay and Beattock. The progression of these works will facilitate sufficient supply capacity is available from Great Britain and ensure that the best estimate 1-in-50 peak day demand is met across the NDP horizon.

4. Screening for Appropriate Assessment of the draft Plan

4.1 Review of the draft Plan

The information within the draft Plan was reviewed for any material which could be defined as a source and a pathway for effect on European sites. These could take the form as actions, targets, measures, or material that could be considered to require development consent. Whilst the draft Plan contains detail in regard to the GNI network, assets, future demands and potential prospects for the future, it does not contain any detail which has been identified as an action, target, measure or material considered to require development consent.

4.2 Review Outcome

Following the review of the draft Plan, it was determined that there was no material within the draft Plan that could be determined as a source of impact, nor was there any pathway for effect on any European sites.

Therefore, in accordance with the relevant guidance set forward by the OPR¹⁹, there is no instance(s) for likely significant effect(s) on European site(s) contained within the draft NDP.

¹⁸ A severe winter peak day that is statistically likely to occur once every fifty years

¹⁹ OPR (2021) Office of the Planning Regulator. Appropriate Assessment Screening for Development Management. OPR Practice Note PN01. March 2021. Accessed at <https://www.opr.ie/wp-content/uploads/2021/03/9729-Office-of-the-Planning-Regulator-Appropriate-Assessment-Screening-booklet-15.pdf>

Appendix A

Statement of Competency

Donncha Madden has a BSc in Applied Ecology and a PGEDip in Restoration Ecology and is a Chartered Ecologist and Full Member of CIEEM. Donncha has over 20 years' experience in the environment and ecology sector and has prepared numerous Appropriate Assessment Screening and full Appropriate Assessment reports for a variety of plans and projects in both Ireland and the UK.

Rory Quinn has a BSc in Environmental Management and is a Qualifying Member of CIEEM. Rory has one year of experience working as an ecologist in the private sector and has contributed to the preparation of Screening for Appropriate Assessments/ Natura Impact Statement Reports in Northern Ireland and the Republic of Ireland across a variety of infrastructure projects.