



Indaver response to the draft Regional Spatial & Economic Strategy (RSES) for the Northern & Western Regional Assembly

Background

Indaver welcomes the opportunity to respond to the draft Regional Spatial & Economic Strategy (RSES) for the Northern & Western Regional Assembly.

Indaver provides waste treatment services to a significant municipal, commercial and industrial customer base across the North West region and owns and operates a 17MW hybrid renewable waste-to-energy generator in Duleek, Co. Meath. This facility treats waste that cannot be prevented, reused or recycled.

In line with European and national policy, Indaver takes the view that whilst waste reduction and elimination must be prioritised, unavoidable wastes that cannot be recycled in a sustainable manner, can be safely and effectively treated by the waste-to-energy (WtE) process. Anaerobic digestion can be used to treat biodegradable, brown-bin waste and in turn produce renewable gas.

Given the broad nature of the draft RSES, our comments are limited to infrastructure development (energy, water and waste) and All Island cohesion.



Growth Ambition 5: Infrastructure – Enabling Our Region

In order to meet Ireland’s international climate obligations and EU mandated environmental and renewable energy targets, the RSES must allow for the development of a low carbon, climate resilient, and environmentally sustainable economy. In the immediate term, a reliable, secure water supply and wastewater treatment is essential. Improved water quality brings environmental, social and economic benefits. The Regional Waste Management plan has set out the region’s key objectives in the delivery of waste management. The Region’s approach to waste management must contribute to the delivery of the commitments in the RSES and National Planning Framework (NPF).

The sections below address renewable energy and the low carbon transition, waste infrastructure and water infrastructure.

Renewable Energy and a Low Carbon Future

Indaver welcomes the Regional Policy Objectives (RPO) outlined to meet renewable objectives and enable the low carbon transition. The RPOs not only address the electricity and gas infrastructural requirements to facilitate this, but also look to develop skills for the renewable energy sector and raise public awareness of the renewable energy potential to encourage renewable energy business development.

Biomass is derived from organic material such as trees, plants, and agricultural and municipal waste and can be used for heating, electricity generation, and transport fuels. As is outlined in the draft RSES, biomass is particularly useful for the heat sector and biofuels can contribute to the transport sector.

The RPO of a safe, secure and reliable electricity network (187) and the reinforcement and strengthening of the electricity transmission network are of paramount importance to underpin regional development and to assist in meeting EU mandated targets. Significant investment in our electricity system will be required over the next 20 years in order to meet projected demand levels, remove constraints, build greater efficiency into the network and allow for additional renewable energy capacity. In terms of the outlook for natural gas, biogas will have an important role to play in meeting EU targets. Gas Networks Ireland (GNI) has a strategic plan to achieve 20% renewable gas on the network by 2030 which is equal to circa 11.6 TWh of Renewable Gas.¹ Biomethane grid injection will be underpinned by a network of anaerobic digestion plants using feedstock from the surrounding area to produce renewable biogas at dedicated grid injection facilities. This has the potential to create regional employment opportunities.

Recommendation:

The RSES should address the planning and zoning requirements needed to roll-out an integrated AD and grid injection network.

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

Waste infrastructure

The implementation of the Waste Framework and Landfill Directives have been instrumental in diverting waste away from landfill which is regarded as the least desirable and most environmentally detrimental tier of the waste hierarchy. The “waste hierarchy” ranks waste management options according to what is best for the environment. It gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill and incineration without energy recovery).



The anaerobic digestion of biodegradable waste is at the middle tier of the waste hierarchy and is considered as recycling.² The RSES can therefore be informative in terms of meeting EU mandated waste targets, climate obligations and renewable energy targets. In line with Government policy, the potential of anaerobic digestion not only generates energy, but also gives effect to national waste policy in terms of utilising waste as a resource.³

At regional level, the circular economy has been endorsed by local authorities in the Connacht Ulster Region Waste Management Plan, with adopted targets for waste reduction. The circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.⁴ The Connacht Ulster Region Waste Management Plan is the framework for the prevention and management of wastes in a safe and sustainable manner.

² <http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

³ <https://www.dccae.gov.ie/documents/Energy%20White%20Paper%20-%20Dec%202015.pdf>

⁴ <http://www.wrap.org.uk/about-us/about/wrap-and-circular-economy>

Connacht Ulster Region Waste Management Plan

The plan provides policy direction setting out the Region wants to achieve and a roadmap of actions. Key objectives of the plan are to reduce landfill, increase recovery and increase generation of energy. It covers the period from 2015 to 2021 and is required to be revised or replaced every six years. The plan aims to reduce to 0% the direct disposal of residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices. In line with one of the most effective measures to meet recycling objectives, the plan aims to increase the level of source-segregated kerbside collections in the region with a strong focus to ensuring that a three bin system becomes commonplace.⁵

Recommendation

Indaver fully supports RPOs 192 – 195 as included in the draft RSES. As is outlined in further detail on the All Island Cohesion section below, regional waste planning guidance must provide for the necessary capabilities to provide for affordable means of contingency within the waste sector.

Water Services Infrastructure

Indaver agrees that the growth ambition must enable the provision and maintenance of economic infrastructure, such as energy, water, and wastewater, in order to allow growth and a connected, vibrant, inclusive, resilient and smart region. This includes the need to support investment for water and wastewater services in the first instance where existing facilities are insufficient to meet current demands above. There is now an exigent need to develop alternative biosolids treatment facilities.⁶ At present, approximately 80% of sludge produced in Irish wastewater treatment plants are applied each year as fertiliser to agricultural land. This practice of spreading biosolids on agricultural land as the primary means of municipal sludge management in Ireland is prohibited in many European countries due to environmental and health concerns.

This policy objective is also laid down in the National Wastewater Sludge Management Plan (NWSMP) and the National planning Framework (NPF) and serve to further underline the need for alternative treatment structures for the management of biosolids in the Eastern & Midland region in order to protect human health as an element of the proper, environmental and sustainable management of water.

Recommendation

An alternative to land spreading for biosolid management should be considered as matter of urgency as it is a resource which, if exploited fully, is capable of adding further value in terms of energy extraction whereby this unavoidable waste is transformed into a useful and valuable resource in line with circular economy principles.

⁵ <http://www.curwmo.ie/wp-content/uploads/2015/10/Executive-Summary.pdf>

⁶ Treated sewage sludge, commonly referred to as “biosolids”, is the organic by-product of urban wastewater treatment. If appropriate treatment is applied, it may be reused as an agricultural fertiliser.

All Island Cohesion

In the context of ongoing North-South cooperation and in addition to the areas of collaboration listed in the Consultation document, environmental protection is formally recognised in the Good Friday Agreement. In combination with enduring intergovernmental coordination, this overarching institutional framework has contributed to enhanced economic integration across the island whilst adhering to and applying key EU rules centred on sustainability and environmental protection.

With this framework in mind and given the significant projected population figures and correspondent waste arisings, a coordinated and strategic approach to waste management on an all-island basis and alignment with key policy objectives is of fundamental importance if the island is to be in a position to manage increased levels of waste in an environmentally sound manner.

An all-island waste strategy, informing the four regional waste plans (including the recently mooted suggestion of developing a single waste region in Northern Ireland, alongside the existing Connaught-Ulster, the Eastern Midlands and the Southern regional waste management plans) would facilitate a collaborative approach and would serve to ensure that all recovery, disposal and treatment options available on the island would be firstly exhausted before relying on export. Furthermore, it would also provide much needed contingency and flexibility in the management of waste should this be required on an all-island basis.

As is provided for under EU waste legislation, the development of an All-Ireland approach to waste management would help to ensure a joined up approach to strategic infrastructure and investment decisions that have a cross-border dimension and would also assist in the development of mutually beneficial policy to address common environmental challenges including those likely to be posed by the Brexit process.

Recommendation

The development of an all-island waste strategy, which informs the four regional waste plans, should be considered as an objective of the RSES in order to facilitate an all-island approach to sustainable waste management.

Conclusions

The recommendations in this submission will assist in providing the necessary waste management framework for a growing population. The roll-out of AD and gas grid injection facilities will assist in the low carbon transition while creating regionally balanced job opportunities.

The Government has indicated greater alignment between local authority development plans and the National Planning Framework (NPF) process. Consistency between the RSES and development plans will also be required. The RSES, and indeed the complementary regional waste planning guidance, must provide for the necessary capabilities to respond to projected increases in population and provide for affordable means of contingency (of an all-island nature) within the waste sector.