

7th February 2019

RSES Submissions

NWRA,

The Square,

Ballaghaderreen,

Co. Roscommon

Email: rses@nwra.ie

Re: Submission in Relation to Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly

Dear Sirs,

The Atlantic Economic Corridor (AEC) Business Forum welcomes the opportunity to make a submission in relation to the Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly as part of the consultation process.

We wish to make some observations as set out below. Our response concentrates on key points of principle rather than a detailed page by page or line by line analysis. It is envisaged that Individual Chambers will focus on issues of detail relevant to their respective catchment areas and boundaries.

We will make a separate submission in respect of the Draft Regional Spatial and Economic Strategy for the Southern Region part of which is located within the AEC region.

This submission is presented under five key headings as follows:

- Economic Basis of RSES
- Core Principle of AEC and AEC to be designated as a special Economic Zone
- Broadband and Ten-T Core Designation
- Climate Action and Low-Carbon Economy
- Population Growth

Economic Basis of RSES

The Draft RSES is supported by several documents including Strategic Environmental Impact Assessment, Flood Risk Assessment, Socio-Economic Baseline and Analysing the Regional Potential. The latter report includes a compilation of summary socio-economic insights for the main population centres as well as a brief sectoral review in relation to industry. However, there is no cost-benefit analysis or no economic basis as a basis for economic growth for the Draft RSES plan. Accordingly,

the “E” in “RSES” is not addressed and, while aspirational and reflecting the ambition of the region, the Draft RSES is meaningless in terms of a sound economic strategy.

By promoting the growth of enterprises in a region, one is providing the underpinnings for the growth of the region's population. However, enterprise development models that succeed in urban settings are unlikely to succeed in non-urban settings. The AEC population outside the city areas of Limerick and Galway is scattered among a series of smaller towns and villages which often have poor road links, non-existent rail links and inadequate broadband. Unless enterprise development policies are placed at the centre of the strategy, the centripetal forces that have distorted spatial growth in Ireland are likely to continue to operate.

It is an objective of Project Ireland 2040 National Planning Framework (NPF) that Ireland becomes a “Low Carbon Economy” by 2050. This reflects the Government’s 2014 National Policy Position on Climate Action and Low-Carbon Development and is also a binding EU requirement.

The AEC area offers significant future opportunity in terms of attaining an economy that is “Green” based on the use of renewables (including offshore renewables) and based on sustainable practice throughout all sectors of our economy. The early development and implementation of a “Low Carbon” strategy offers the West of Ireland to be a world leader and taking the “Masdar” concept to regional scale. This will attract Foreign Direct Investment and promote a culture of cutting-edge research within our third level educational institutions. The RSES should include an RPO **that a Strategy to develop a “High-Value, Low-Carbon Economy” be developed and implemented at the earliest possible date.**

Core Principle of AEC and AEC to be Designated as a Special Economic Zone

We are pleased to note the multiple references to and a number of descriptions of the AEC in the draft RSES.

The recognition and references are welcome indicators of progress towards the delivery of a linked and linear city composed of urban and inter-urban areas each with their own autonomy but with the common ambition to collaborate in new forms of development.

Many of the city and town plans within the RSES refer to links to the AEC with a strong emphasis on transport infrastructure. While this is welcome, there is a risk that the AEC is seen as a transport corridor when in fact it is much more than that.

The AEC concept fits with the [European concept of polycentric development](#) which is not about cities making massive investments in order to grow bigger. Instead it is about building linkages and joining forces with neighbouring cities and towns in order to “borrow” size and quality, to ensure positive spill-over effects for the development of wider regions.

The AEC believes that the final edition of the RSES should, at an early point in the document, include an overarching statement of intent to achieve polycentric development across both the North-Western and Southern Regional Assembly Areas in order to build on and realise the comparative advantages and opportunities that exist across the entire Atlantic Economic Corridor.

There is an opportunity through the RSES to create a framework for future actions which will reinforce connection and growth across the corridor. By doing this, both RSES documents will treat the AEC as much more than a point of reference and overcome the risk of the AEC being seen as a transport corridor. The RSES documents must build on the work of the NPF by demonstrating that

the AEC is a Strategic Economic Zone which cuts across administrative boundaries including the North West Regional Assembly area and The Southern Regional Assembly area. **In this respect, we call for the AEC area to be designated as a special Economic Zone which would be managed across the NWRA area and SWA area by appropriate Government Agencies. This aspiration should be reflected in the RSES.**

Broadband and Ten-T Core Designation

As set out above, the AEC is a strategic economic zone which cuts across the NWRA area.

To enable the AEC concept to work and to facilitate the development of the “**High-Value, Low-Carbon Economy**”, effective communication and transport links are required along the corridor. This will be mirrored so as to enable the further development of the parallel tourism initiative of the Wild Atlantic Way.

We welcome the Smart Region concept in Section 6 and the RPO’s 141 to 162 which will be enabled by the digital connectivity RPO’s 136 to 140. For the concept to be realised, the whole of the region needs to be enabled and not just the main urban areas. **We recommend that a study of broadband delivery be undertaken annually which will include a review of the delivery and effectiveness of the National Broadband Plan and which will make also make recommendations for appropriate interventions and policies to be implemented so as to facilitate the development of a Smart Region.**

Page 222 states that the completion of the TEN-T route from Derry, Letterkenny, Sligo to Galway and from Limerick to Cork as a mechanism to prioritise investment in roads and environmentally sustainable public transport as an enabler of effective regional development. Ireland is part of the North Sea – Mediterranean TEN-T Network. The “Core” network runs from Belfast to Dublin to Cork and with a spur to Limerick which has recently been extended to Foynes [Proposal for a regulation (COM (2018)0568 – C8-0385/2018 – 2018/0299(COD)), 10th January 2019]. While elements of the N4 and N5 routes are designated as part of the “Comprehensive” TEN-T network, many of the routes from Galway to Letterkenny fall outside any TEN-T designation. This is as a result of an Irish Government action in 2013 to omit the entire West and the North West from TEN-T status. Thus, the statement on Page 222 is incorrect as there is no Ten-T core route north of Limerick since 2013.

Various gaps will arise in TEN-T Core network as a result of the UK’s decision to leave the European Union and there is opportunity to realign the TEN-T core network so as to ensure Ireland’s continued connectivity with Europe. So as to achieve this objective, sea ports and airports will need to be developed further and enhanced road and rail links will be required along the Atlantic Economic Corridor area. The decision of the EC on 10th January recognizes this and aims to ensure the connectivity between Ireland and mainland Europe by amending the current CEF Regulation (1316/2013) with regard to the withdrawal of the United Kingdom from the Union. It provides details of “Brexit” investment for the five TEN-T ports on East and South of Ireland (Dublin, Cork, Rosslare, Waterford and Shannon / Foynes) but with the total omission of west and north-west Ireland i.e. NWRA area. While the inclusion of Foynes is welcome, the omission of any port within the NWRA area is a huge concern and has the potential to further marginalise the north-west of Ireland. The AEC submits that a **Regional Policy Objective should be added to Section 6.3 of the**

Draft RSES as follows “Support and actively promote the designation of the TEN-T Core Network within the NWRA Region from Galway to Sligo to Donegal”. A similar submission will be made to the SWA’s RSES in relation to designation south of Limerick. This will provide the catalyst for development of various infrastructural elements such as roads, rail, airports and seaports which are currently not on any programme. The prioritization of investment for this transport infrastructure will be a key enabler to achieving a **“High-Value, Low-Carbon Economy”**

We welcome the inclusion of various roads within Regional Policy Objective 109, Page 231 and note that while many of these are not on any current Transport Infrastructure Ireland Programme, the aspiration to develop same must be maintained. The map on Page 24 is particularly stark as the only parts of Ireland that are greater than 60 minutes from any motorway are all within the AEC Region. The designation of TEN-T core network within the AEC going both northward and southwards from Limerick will provide a framework for future roads, rail, airports and seaports.

We endorse and support Regional Policy Objectives 113-119 in relation to rail and Regional Policy Objectives 61-63 in relation to harbours. Designation of TEN-T Core network, as submitted above, will provide focus on the realisation of these objectives. However, like many of the roads discussed above, these aspirations are not reflected on any funding plans and it is evident that a much greater commitment in terms of the funding of projects is necessary in the short-term, particularly given the urgency associated with Brexit.

Climate Action and Low-Carbon Economy

While the AEC supports Regional Policy Objectives 39 to 48 and RPO 58 in relation to renewable energy and RPO’s 187, 189 and 190 in relation to electricity transmission, various studies have shown that the electricity transmission grid has little or no capacity for further expansion in the Sligo/ Mayo / Donegal area and the projects listed in Table 1, Page 278 will do little to alleviate potential capacity issues which could become a barrier to economic growth.

In a recent (December 2018) briefing document, the Western Development Commission state:

“The Western Region already has a significant connected renewable generation (almost half of the generation in the Region is renewable) and the Region is currently producing enough renewable electricity to meet more than 100% of its own demand. By 2020 there could be 1,760MW of renewable generation connected in the Western Region, consisting of 1,595MW of wind generation and 165MW of hydro generation. By then renewable electricity from the Western Region will provide approximately 15% of the total national electricity demand and make a significant contribution to Ireland’s share of the EU 2020 renewable energy targets. Further ahead, to meet European targets for 2030, the new Renewable Electricity Support Scheme (RESS) aims to almost double the amount of renewable electricity by 2030 compared to 2020. This provides the opportunity for further development of renewable generation in the Western Region potentially making it a major provider of renewable electricity to the rest of Ireland.”

The document goes on to state:

“It is important that there is a three-pronged approach to developing the transmission grid in the Region:

- 1. Upgrading existing transmission infrastructure*

2. *Implementing smart grid solutions*
3. *New transmission infrastructure*

To achieve long term ambitious climate action increased renewable electricity generation will be essential. Therefore, further investment in transmission grid with sufficient capacity for new generation connections is crucial.”

There is a need for EirGrid to produce a new Grid Development Strategy with a timeline out to 2040 so as to address shortcomings in capacity and provide opportunity to connect renewables. Such a timeline is required as the lead in time for delivery of such infrastructure is often 15-20 years. The opportunity to connect renewables will be further enhanced by the future availability (c. 2025) of floating wind turbines which could be deployed in the Atlantic Ocean. The AEC submits that **the following be added to Regional Policy Objective 188 “The Assembly will promote the preparation of a grid transmission strategy for the Region with a timeline to at least 2040. It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.”**

The AEC welcomes the inclusion of Regional Policy Objective 191 in relation to gas supply. We also welcome the inclusion of the short-term initiative in relation to the proposed Compressed Natural Gas (CNG) Network for Sligo as described in Page 129. While the more widespread use of gas from the Corrib Gas field would be a transitional step toward a low-carbon economy, such an ambition would be enhanced by the injection to the gas network of biogas generated at anaerobic digester sites using either agricultural waste or domestic organic waste as feed. In future, offshore wind turbines could be used to generate hydrogen which could be injected into the gas network. There is potential for increased opportunity for us in the West of Ireland by the future development of this potential resource and which can be a key driver in the attainment of a **“High-Value, Low-Carbon Economy”**. The AEC submits that **the following be added to Regional Policy Objective 191 “It is an objective to support the sustainable development of the gas network so as to integrate renewable energy sources.”**

Population Growth

We note the transitional population estimates for each sub-region and county which are tabulated on Page 26. We also note that these are rounded to the nearest 500 and are expressed as a range with a 20% variation. We welcome the ambition to have an additional 180,000 persons living across the region. This is one of the key reasons why the AEC came into being – to reverse population decline and the drain of young people from the AEC area. However, we caution as to trying to specifically mandate as to exactly how the population growth would be geographically dispersed and that the figures within the Table on Page 26 (and elsewhere in the Draft RSES) should not be construed as being limits or caps on population. Population growth at any particular location should be in response to economic opportunity and consequent development.

Summary

The following are the key elements of our submission:

While aspirational and reflecting the ambition of the region, the Draft RSES is not supported by a sound economic strategy. An economic study should be conducted at the earliest possible date so as to inform the RESS.

We call for the AEC area to be designated as a special Economic Zone which would be managed across the NWRA area and the SWA area by appropriate Government Agencies. This aspiration should be reflected in the RSES.

The RSES should include, as an RPO, that a Strategy to develop a “High-Value, Low-Carbon Economy” be developed and implemented at the earliest possible date and that this should be a key driver for economic development.

We recommend that a study of broadband delivery be undertaken annually which will include a review of the delivery and effectiveness of the National Broadband Plan and which will also make recommendations for appropriate interventions and policies to be implemented so as to facilitate the development of a Smart Region.

A Regional Policy Objective should be added to Section 6.3 of the Draft RSES as follows “Support and actively promote the designation of the TEN-T Core Network from Galway to Sligo to Donegal.”

The following should be added to Regional Policy Objective 188 “The Assembly will promote the preparation of a grid transmission strategy for the Region with a timeline to at least 2040. It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.

The following should be added to Regional Policy Objective 191 “It is an objective to support the sustainable development of the gas network so as to integrate renewable energy sources.”

Population growth at any particular location should be in response to economic opportunity and consequent development. We caution as to trying to specifically mandate as to exactly how the population growth would be geographically dispersed and that the figures projected in the Draft RSES should not be construed as being limits or caps on population.

The AEC Business Forum appreciates the opportunity to contribute as the RSES for the NWRA is further developed and is finalised. We look forward to seeing the updated document in due course.

Yours faithfully,

Mike Devane, on behalf of the AEC Business Forum