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Mid Term Review of the Regional Airports Programme 2021-2025,
Department of Transport,
Aviation Policy Division,
Leeson Lane,
Dublin 2

16th June 2023

Re: Submission to Mid Term Review of the Regional Airports Programme 2021-2025 Consultation

A Chara,

Please find attached a submission from the Southern Regional Assembly (SRA) on the Mid-Term Review of the Regional Airports Programme 2021-2025.

This submission has taken a number of relevant questions from the consultation survey based on the role of the SRA under Section 3 Maintaining and Enhancing Regional Connectivity, Section 4 Supporting Balanced Regional Economic Growth and Development and Section 6 Carbon Reduction & Climate Change.

Our submission responds to these questions and provides recommendations for:
- Recommendation 1: Sustainable Mobility Connectivity to Regional Airports
- Recommendation 2: Multi Modal Freight Connectivity Servicing Regional Airports
- Recommendation 3: Preparation of an Airport Strategy for the Southern Region
- Recommendation 4: Continue and Strengthen Funding Supports to our Region's Airport Infrastructure
- Recommendation 5: Airports Driving Regional Development and Economic Growth
- Recommendation 6: Develop Indicators to Communicate the Contribution of Regional Airports to the Development of Regional Economies
- Recommendation 7: Net Zero Carbon Ambition and Targets for Airports and the Aviation Sector

1.0   Introduction: Our Region's Airports Driving Balanced Regional Development

The SRA welcome the opportunity to input to the development of the new national policy support for regional airports.

The SRA strongly supports the role of regional and national airport infrastructure (Cork Airport , Shannon International Airport, Kerry Airport and Waterford Airport) as individual and combined assets driving regional and state economic growth.

Our Region's airports are gateways for business and tourism directly into the region and all are closely integrated with our Cities and Metropolitan Areas, national economic corridors (the Atlantic Economic Corridor and Eastern Corridor) and national tourism corridors (the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands) in our Region.

The SRA welcome the stated goals of the review which are to ensure effectiveness and delivery of enhanced regional connectivity, support balanced regional economic growth and direct access into the regions. The SRA also welcome the stated goal for a decarbonisation of airports and transition to a more financially sustainable model.

Our airport assets play a vital role in delivering National Strategic Outcomes under Project Ireland 2040: The National Planning Framework (NPF) for Enhanced Regional Accessibility, High Quality International Connectivity and A Strong Economy.

These national policy priorities are supported in the Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES) of the Southern Region which supports regional infrastructure investment in connectivity for economic competitiveness, resilience and to provide a platform for enterprise growth.

The RSES specifically supports our airports through RPOs for International Connectivity, National Aviation Policy, Airport Strategy for the Southern Region and for the role of our airports driving economic growth for our cities, metropolitan areas , key towns and rural region[1].

The Southern Region has the State's most significant proposition to achieve the aim of balanced regional development and Regional Parity. The NPF and RSES targets our three cities and metropolitan areas (Cork, Limerick-Shannon and Waterford) to grow by 50%-60% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. The Southern Region's population is targeted to grow by up to an additional 343,500 persons by 2031 and an additional 225,000 in employment.

Strengthened international and regional connectivity through our airports will be key to servicing this population and economic growth. It is imperative that the Region's airport infrastructure and the services they provide are maintained and invested in for their existing and future contribution to regional economic development.

Equally, regional policy objectives support our transition to become a green, low carbon society and economy. Our transport networks need urgent actions for a low carbon transition and the aviation sector is no exception. Our RSES specifically seeks action to transition the movement of freight, ports and airports to a low carbon future and we expect priority for innovation and smart technologies to transform airport infrastructure and services to lower carbon emissions.

2.0: Consultation Question 3.2. Is there scope for collaboration to take place between regional airports and other stakeholders in their regions, in relation to improving accessibility/sustainable transport modes to and from regional airports?

Connectivity to airports , for passengers, freight and staff, needs to be achieved by increasing rates of sustainable mobility to achieve our Climate Action Plan and National Sustainable Mobility Policy target for a 50% reduction in transport emissions by 2030 and to reduce the total distance driven across all car journeys by 20%.

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[1] RPOs 140 International Connectivity, RPO 148 National Aviation Policy, RPO 149 Airport Strategy for the Southern Region, Cork MASP Objective 14 Cork Airport, Limerick-Shannon MASP Objective 15 Shannon International Airport and Waterford MASP Objective 16 Waterford Airport refer. The RSES is available at: https://www.southernassembly.ie/regional-planning/rses.

Airports are strategic locations to service on transport network planning from international to local level. Under the EU Trans European Network (TEN-T) policy , funding through the Connecting Europe Facility is putting in place a Europe wide transport network across all modes with improved infrastructure usage, reduced environmental impact, improved energy efficiency and increased safety.

It comprises a Core Network (which includes Cork Airport as a node) to be completed by 2030 and a Comprehensive Network (which includes Shannon International Airport, Kerry Airport and Waterford Airport) to be completed by 2050.

Metropolitan Transport Strategies prepared for Cork, Limerick-Shannon and Waterford by the NTA, TII and Local Authorities in consultation with stakeholders, each identify improved public transport accessibility to airports integrated with the city and metropolitan transport networks. It is essential that long term funding is secured to deliver the infrastructure projects and actions identified in these important transport strategies. The Regional Airport Programme and future National Airport Policy needs to complement these plans and support their funding and implementation, in recognition of the improved sustainable accessibility they will provide to airport locations.

In a similar manner, regional airport policy needs to support the preparation of land use and transport integrated planning at county and local level, support the preparation and implementation of Local Transport Plans, the implementation of the NTA 's Connecting Ireland Rural Mobility Plan and support Local Link urban and rural public transport networks. These plans and services will strengthen multi modal accessibility between national and regional airport locations, urban centres and rural areas, ensuring passengers and staff have greater opportunity to interconnect with different public transport services to access regional airports. This is especially important for sustainable mobility options for tourists using our Region's airports to access visitor attractions, destination towns and tourism corridors in the Region.

- **Recommendation 1: Sustainable Mobility Connectivity to Regional Airports**
  The Regional Airport Programme needs to support the funding and implementation of actions identified under Metropolitan Transport Strategies, County and Local Transport Plans, the NTAs Connecting Ireland Rural Mobility Plan and Local Link Transport Services which identify infrastructure projects, actions and services that strengthen sustainable mobility access to airports for passengers, staff and tourists accessing our Region. Airport operators are key stakeholders to engage with the NTA, TII, Local Authorities and other stakeholders in the preparation and implementation of local transport planning. The implementation governance of the Regional Airport Programme should encourage such collaboration to strengthen sustainable mobility access to airports.

The movement of freight to and from airports by sustainable mode is of increasing importance for a growing open market economy. The National Aviation Policy 2015 notes that while air freight accounts for a small percentage of the total freight by tonnage transported into Ireland, it accounts for 35 percent of the value of all Irish freight. Therefore, it will be important that future planning on the movement of goods ensures access is strengthened to airports.

The All-Island Strategic Rail Review is currently examining all aspects of inter-urban and inter-regional rail connectivity on the island of Ireland, including an analysis of rail connections to the major seaports and airports, and the future use of the rail network for freight movements.

Ireland's Road Haulage Strategy 2022-2031 states preparation of strategies for sustainable freight distribution for all of the larger urban centres in Ireland including the metropolitan areas of the four regional cities, will provide a solid basis to achieve more effective management of goods movement. Stakeholder involved will include airport operators in addition to the transport authorities and local authorities.

Action 23 of the Road Haulage Strategy states the NTA, in consultation with key stakeholders, will develop Strategies for Sustainable Freight Distribution for the Metropolitan Areas of Cork, Limerick and Waterford in our Region. Airport operators will be key stakeholders in the preparation of these metropolitan freight strategies.

Ireland's Road Haulage Strategy 2022-2031 also recognises the importance of goods movement at regional level via Regional Freight Strategies. These strategies should be consistent with the objectives of the RSES, with a particular focus on inter settlement freight movement and on the preparation of freight distribution plans for key towns and other large urban centres.

Action 24 of the Road Haulage Strategy states the Regional Assemblies, with the NTA, will lead the development of Regional-Level Freight Strategies in consultation with key stakeholders, consistent with the objectives of the RSESs. Airport operators will be key stakeholders in the preparation of these metropolitan freight strategies.

- **Recommendation 2: Multi Modal Freight Connectivity Servicing Regional Airports**
  The Regional Airport Programme needs to support the implementation of the All Island Strategic Rail Review and support an increasing role for interchange with rail for the movement of passengers and goods to access airport services. Further, the Programme needs to support an active role for airport operators as key stakeholders in the development of metropolitan level and regional level freight strategies to facilitate growing trade and the movement of goods to and from airports by lower carbon modes.

3.0   Consultation Question 3.5. There have been calls for a regional air access strategy to enhance overall regional connectivity. What are your views on the potential for regional airports to collaborate and coordinate such a strategy?

The SRA are currently in the process of preparing an Airport Strategy for the Southern Region, in recognition of:
- the strategic role of our airports as a collective regional infrastructure asset,
- to foster greater collaboration and harnessing the complementarity these assets can offer to the region (niche economic and servicing roles as opposed to competing roles),
- the individual and combined capacity of these facilities to service the state and region with international connectivity for the movement of goods and people;
- the individual and combined capacity of our Region's airport assets as an attractive alternative to heavy reliance on Dublin's Airport infrastructure (the principle of redistributing growth to the regions outside of Dublin and the Mid-East for Regional Parity),
- the economic contribution and footprint airport assets and services make to the Region's economic growth, and ;
- the need to, and opportunities of, developing innovation and smart technologies to transition the aviation sector to a low carbon future.

The strategy will be prepared as a regional level support to central government in preparing regional and national airport policy and provide a case for funding airports in our Region. An evidence base, including the commissioning of economic research on the economic footprint of regional airports for the development of the Region's economy, will be provided to the Department of Transport as the work develops to assist the development of regional airport policy and a review of national aviation policy.

The strategy will be developed in consultation with key stakeholders including airport operators, economic stakeholders and Local Authorities with airport infrastructure for set of agreed recommendations that positively contribute to regional and national aviation policy development.

Consultation between the Department, Regional Assemblies and Local Authorities with airport infrastructure in the Southern Region will be important. This will help to align actions supported under the Regional Airport Programme with complementary initiatives of the Local Authorities developing infrastructure projects, connectivity, economic development, tourism growth and in other themes which support the role of our Region's airports.

The SRA have previously engaged (in July 2022) with the Department's Aviation Policy Division on this initiative and we aim to advance it over Q3-Q4 2023. We encourage further collaboration with the Department on this initiative beyond this consultation period to ensure it provides an effective input to strengthening national support to our Region's airports of Cork Airport, Shannon International Airport and especially, in the context of the regional airport policy, the role of Kerry Airport and re-establishing services for Waterford Airport, all of which are strategic transport assets to service our Region's growth and competitiveness as a connected Region.

- **Recommendation 3: Preparation of an Airport Strategy for the Southern Region.**
  (i): The SRA seeks continued collaboration with the Department of Transport in the development of regional and national aviation policy to ensure the preparation of an Airport Strategy for the Southern Region. This strategy, mandated by RPO 149 of the RSES, will aim to provide the Department with an evidence based set of recommendations from the regional perspective and through regional stakeholder consultation, including our Local Authorities with airport infrastructure, to support the sustainable growth, infrastructure development and capacity of our Region's airport assets (Cork, Shannon International, Kerry and Waterford Airports) to drive the region's economic growth.
  (ii): The SRA strongly encourage consultation between the Department, Regional Assemblies and Local Authorities in the Southern Region with airport infrastructure in the development of future regional and national airport policy.

4.0   Consultation Question 4.1. How do you consider the Programme is currently delivering on its objectives, primarily in the context of supporting balanced regional development?

The current Regional Airport Programme recognises the important role of regional airports in strengthening connectivity into the regions for regional development.

The SRA support a continuation of the existing Programme's emphasis on building the capacity of regional airports to handle scheduled services. Ensuring our regional airports are infrastructure ready, future proofed (the green transition of airport operations) and supported with communication on their capacity and role in regional development is important in the liberalised model of the air industry market to attract flight services. The SRA fully supports continued funding to our Region's airports to achieve their potential and capture market share for strategic routes and services.

Financial support should be continued for capital investment through the CAPEX scheme and also through the Public Policy Remit-Capital (PPR-C) and Public Policy Remit-Operational (PPR-O) funding schemes. These latter schemes ensure projects that improve the operation, safety and zero carbon transition of operation facilities and essential emergency services are funded and provided for. As these schemes are not subject to State aid rules, investing in airport facilities and infrastructure in these terms is an investment in the infrastructure capacity of the State and Regions. It should be viewed as an investment that will return dividends for regional and state economic growth.

There are also opportunities to harness EU funding supports towards our Region's airports, such as the Recovery and Resilience Facility, which aims at making Europe more sustainable, resilient and better prepared for the challenges and opportunities of the green and digital transitions.

In the preparation of the RSES, the strategic role of airports in supporting regional economic development was raised , not only by airport operators, but by multiple cross sectoral stakeholders.

This led to the identification of RPO's 140 to 150 for international connectivity, National Aviation Policy and the development on an Airport Strategy for the Southern Region. These objectives are a testament to our regional call for central government to invest in the capacity and role our airports play for regional economic growth.

Further, the important role of airports for connectivity and economic development in each of the Cities and Metropolitan Areas is recognised under the Metropolitan Area Strategic Plans (MASPs) for Cork , Limerick-Shannon and Waterford (Cork MASP Objective 14 Cork Airport, Limerick-Shannon MASP Objective 15 Shannon International Airport and Waterford MASP Objective 16 Waterford Airport respectively).

The role of Kerry Airport as an economic driver in for the Kerry Knowledge Triangle, for the Key Towns of Tralee and Killarney and as a strategic asset for sub regional economic growth is recognised in RPO 15 Tralee, RPO 18 Killarney and RPO 30 Inter Urban Networks-Regional Drivers of Growth.

To achieve these objectives and to implement the NPF and RSES principle of redistributing growth to the regions outside of Dublin and the Mid-East for Regional Parity, there needs to be a significant increase in infrastructure investment in the Southern Region, especially to unlock the capacity and potential of airport infrastructure in place of over reliance on Dublin's infrastructure.

In the governance and implementation of the Regional Airport Programme, a strengthened relationship with RSES objectives and support for actions that mutually deliver the implementation of the RSES and Regional Airport Programme should be included.

The SRA note that due to the impact of Covid-19 on air transport, lower passenger numbers brought Cork and Shannon International Airport under state support for regional airports. While temporary, with rebounding numbers removing these airports from direct programme support, the SRA support continued investment for each of our airport assets.

Stakeholder consultation in preparing the RSES pointed to the opportunities for greater co-operation within the sector, where niche tourism and business routes can be services from smaller airports, as opposed to each airport competing for similar destinations and routes. The combined capacity of our four airports in the region working in cooperation, is a significant proposition to alleviate the congestion of Dublin's infrastructure. It is a stronger proposition than each airport competing with Dublin services or competing against each other.

A good example is Waterford Airport, where the Region has the airport facility but the market for passenger and business services needs to be encouraged to use the facility and unlock the potential of the asset. The airport is located servicing one of Ireland's fastest growing cities under the last Census 2022 preliminary figures (12.7% growth since 2016). Direct flights would give access to the growing city and metropolitan area, the South East economy, South East Technological University, Ireland's Ancient East Tourism corridor and the Port of Waterford and Rosslare Euro Port.

In a similar case, Cork, Shannon and Kerry Airports with passenger services are close to large urban centres with significant targeted population and employment growth (Cork Metropolitan Area , Kerry Knowledge Triangle of Tralee, Killarney and Killorglin, Limerick-Shannon Metropolitan Area). The airports access the South West and Mid-West economy directly, University College Cork, Munster Technological University, University of Limerick, Technological University of the Shannon, Midlands and Mid- West, the Ports of Cork, Fenit and Shannon Foynes, fishing harbours and tourism corridors (Ireland's Ancient East and Wild Atlantic Way).

The Regional Airport Programme should continue and strengthen the confident signal on the value of all our airport assets which the market in turn needs to be aware of (the wider regional value of what is accessed through these airports) and capitalise on these assets.

The importance of enhancing regional infrastructure for our economic competitiveness is signaled in the 2023 updates to the European Commission's Regional Competitiveness Index. The index demonstrates that while less developed Region's in Europe are catching up and competitiveness is improving, there are still large differences between EU Regions.

The index shows , that while the Southern Region is considered a more developed region with higher than the EU average scores for macroeconomic performance, labour market and education, it notably performs less than then EU average score for infrastructure competitiveness (approximately only half of the EU average)[2].

It is important therefore, to grow as a competitive region, that each of our airports are supported for infrastructure investment through the Regional Airport Programme and forthcoming reviews of National Aviation Policy. It is important that the scale of such investment and support is aligned with achieving the principles of the NPF for greater regional parity and balanced regional growth, with priority to developing infrastructure in the regions outside Dublin, as required to meet the policies of the NPF and RSES.

- **Recommendation 4: Continue and Strengthen Funding Supports to our Region's Airport Infrastructure**
  (i): The Regional Airport Programme needs to continue and further strengthen funding to airports in the Southern Region under such funding schemes as the CAPEX, PPR-C, PPR-O and leverage EU funding opportunities such as the Green Deal which targets support for the aviation sector. It is important that levels of funding for regional infrastructure match the ambition of national and regional policy to achieve Regional Parity and develop our Region's airport capacity as an attractive alternative to reliance on Dublin's Airport infrastructure for national economic growth. Investment in our airport infrastructure is an investment in regional development and will attract the market for passenger and freight services accessing our Region.

  (ii): The Region's airport infrastructure of Cork, Shannon International, Kerry and Waterford are strategic assets for regional development, singularly and as a combined asset. Their potential as enablers for regional development will be supported if the ambition and level of capital investment for infrastructure development through the Regional Airport Programme is strengthened in line with principles of developing the Regions under the NPF and RSES. The Programme should make this positive connection between implementation of national and regional airport policy driving implementation of national and regional planning and economic development policy.

5.0   Consultation Question 4.3: How are regional airports currently facilitating balanced regional development?

As addressed under the Introduction and Question 4.1, our Region's airports strengthen our Region's international connectivity and position the region as a competitive location, with infrastructure capacity, to attract investment and enterprise growth.

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[2] EU Regional Competitiveness Index 2.0 2022 Edition. Available at: https://ec.europa.eu/regional_policy/assets/regional-competitiveness/index.html#/

In addition to international connections, our airports provide direct access to our cities and key towns, economic corridors (Atlantic Economic Corridor and Eastern Corridor), tourism corridors (Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands), our network of higher and future education campuses and access to a Learning Region, our Tier 1 and Tier 2 Ports and access for connecting people and products across industrial clusters in which the Region excels on a global stage.

These include clusters of industrial specialisms in areas of Agri Food and Agri Tech, Bioeconomy, Marine Economy, Energy, High Tech Manufacturing, Life Sciences, International Financial Services, Digital Industries and Tourism amongst others.

The SRA, it its report Regional Approach for the Development of a Smart Specialisation Strategy in the Southern Region[3], identified a number of emerging priority enterprise sectors where the region is leading in global terms in innovation, competitiveness and has potential for growth.

The Aerospace industry is a growth sector of the Region, associated with our airport assets (the Shannon Cluster for example). Digital services and innovation in digitalisation technology for our Region's green transition (a key enabler for lower/zero carbon airport facilities) is a growing sector.

Diversity in the tourism sector, for which airport infrastructure within the region plays an integral part, is also identified. Before COVID-19's shock to the economy, tourism in the region had been booming. The Southern Region welcomed around 4.7m overseas tourists in 2017, who spent over €1.68b during their visit, as well as ca. 4.5m Ireland residents (incl. NI) spending €0.9b (Fáilte Ireland, 2019)

Being home to all three of Ireland's Regional Experience brands, the Southern Region is uniquely positioned to exploit the new consumer demand trends in a post-Covid-19 environment and strengthen its image in terms of outdoor activity and open space, as well as green, clean and sustainable destinations.

Airport infrastructure and services will increase the international accessibility of the Region and its competitiveness for growth in these sectors of excellence. Accessibility to airports in our Region also increase the potential for longer stays within the Region.

Research in Europe on regional airport challenges and opportunities[4] demonstrate that proximity to an airport is a key factor to attract new companies to a region. Regional airports have a vital role in terms of economic and social cohesion, stimulating tourism and employment, as well as facilitating access to essential services. In addition, they can help to reduce congestion at major hub airports.

Further research in Europe[5] affirms the role of regional airports as essential transport nodes. Regional airports make up c 90% of the European airport network. Between 2005 and 2017, the number of flights (direct connectivity) at regional airports grew twice as fast (+39.1 %) as at major hub airports in Europe (+19.7 %). They facilitate the smooth running of the European single market by connecting people, products and services. The research further shows:

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[3] The SRA's Report prepared with BABLE GbmH Consultants under the Interreg Europe Cohesion Project is available at: https://www.southernassembly.ie/news/news-article/a-regional-approach-to-smart-specialisation
[4] Europa "The Future of Regional Airports: Challenges and Opportunities". Available at: https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/689346/EPRS_BRI(2021)689346_EN.pdf

[5] Airport Council International, Regional Airports Forum publication 2017 "European Regional Airports: Connecting People, Places and Products. Available at: https://www.aci-europe.org/downloads/resources/European%20Regional%20Airports%20-%20Connecting%20People%20Places%20%20Products.pdf

- Access to hub airports remains vital for the global connectivity of any region. But providing direct connectivity to a wider range of destinations within Europe , and even beyond, has become a key competitive asset for any European region

- Airports in the regions are now defining the economies of their communities. This is not only about driving tourism development, but more generally about using airports as catalysts for economic regeneration and growth. While regional airports have a positive impact for companies already established locally, they are essential to attracting new companies and diversifying economic activity.

- Regional airports are now considered prime assets by regional and local authorities. As such, they are not only an essential part of the national and European transport network, they are a vital part of any region's strategy to attract and retain investment and growth.

Of relevance to the collective airport assets of the Southern Region, the research states networks of regional airports provide accessibility to the most remote areas of Europe, allowing every regional community to be part of the European economic and social fabric – and connecting them to the rest of the world. Regional airports also play a vital role as congestion relievers to some heavily congested hub airports, especially for regional services.

- **Recommendation 5: Airports Driving Regional Development and Economic Growth**
  The Regional Airport Programme needs to continue its support for airport infrastructure as competitive assets contributing to regional development and economic growth. As per other EU regions, the Regional Airport Programme and future review of National Aviation Policy needs to continue backing the vital role of airports in our Region for stimulating economic growth, tourism ,employment and access to services. Importantly, the Programme needs to support our Region's airport capacity to reduce congestion at major hub airports such as Dublin and support their infrastructure capacity and capability to attract services.

6.0 Consultation Question 4.4: What indicators could be used to measure enhanced regional development over the course of the Programme?

Relevant to Question 4.3 above, while it is stated in national and regional policy and shown in EU research that regional airports play a vital role in attracting enterprise, new companies, diversifying economic activity and contributing to regional development, there is an absence of accessible data and indicators in Ireland to readily communicate this direct link.

This is a key motivation behind RSES RPO 149 to develop an Airport Strategy for the Southern Region. As stated for Question 3.5, the SRA are currently preparing to engage with specialists to create an evidence base that demonstrates the economic interaction and footprint of the Region's airports on the Region's economy and its future growth potential.

A key indicator to develop from this analysis will be to show the extent of the economic footprint (direct and indirect employment, monetary impact to the region) and to record this performance over a regular period to monitor if our airports are fulfilling their potential to support regional economic development.

Such indicators will be valuable for RSES implementation and the implementation of the Regional Airport Programme. They will provide an evidence base to back continued investment in our airport infrastructure and services.

Such indicators will also be compatible with the Regional Development Monitor (accessed at https://rdm.geohive.ie/), developed by the three Regional Assemblies which sets out a range of Key

Performance Indicators for the Region to measure progress in implementing the objectives of the RSES and NPF in the Regions.

Indicators are provided under the Regional Development Monitor for the themes of Our People and Places, Our Green and Sustainable Future and Our Region's Economy. Indicators that demonstrate the economic contribution of airports to regional economic development will complement this data set and potentially contribute to it. Airport indicators can promote the role of airports in growing a strong economy for RSES and NPF implementation as a performance indicator.

- **Recommendation 6: Develop Indicators to Communicate the Contribution of Regional Airports to the Development of Regional Economies**
    (i): Indicators should be developed that demonstrate the economic contribution of airports to regional economic development (direct and indirect employment, monetary impact to the region inter alia).
    (ii): The SRA welcome continued collaboration with the Department of Transport on the development of an Airport Strategy for the Southern Region which will aim to develop, with specialised services, an evidence base to communicate the economic contribution of our Region's airports and services to our Region's economic development. Further, collaboration will be welcomed to integrate indicators tracking the implementation of the Regional Airport Programme with the Regional Assemblies Regional Development Monitor**.**

7.0 Consultation Question 6.2: Could the Programme better support airports in achieving net zero carbon emissions by 2050? If so, how?

In alignment with RSES RPOs for decarbonisation of the transport sector and low carbon international connectivity[6], it is imperative that the Regional Airport Programme and future National Aviation Policy places the green transition of airport operations and air services as a priority.

Funding, from national and European sources for Climate Action and the European Green Deal, should be targeted through the Regional Airport Programme at our Region's airports to transition with urgency their operations, services and building infrastructure to low carbon emissions, to fund sustainable and low carbon mobility access for passengers, staff and freight movements and support innovative technology and testing for green and alternative fuel sources for air travel.

Through the National Climate Action Plan 23, lower carbon airport operations will be supported through initiatives that develop enhanced public transport connectivity to airports for passengers, staff and goods. Reducing the carbon footprint of road-based freight and commercial traffic accessing airports will be supported through initiatives and policy supporting alternative and biofuels, zero-low emission vehicles and green freight.

The UN's Framework Convention on Climate Change[7] sets out a global commitment to achieve net zero airports, noting that flying is not the enemy of climate change, it's carbon emissions. Initiatives are in place to transition the sector to net zero. In 2019, members of the Airports Council International committed to net zero carbon emissions for all its members airport operations by 2050 without resorting to offsetting. There are commitments for regional airports especially , for short haul flights, to be test beds for using alternative green fuel technology. Short haul test hydrogen flights and electric flights are being developed with innovation and investment in regional airports internationally.

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[6] RSES RPO 90 Regional Decarbonisation, RPO 91 Decarbonisation in the Transport Sector and RPO 139 Low Carbon International Connectivity.
[7] UNFCC Net Zero Airport. Available at: https://unfccc.int/blog/the-net-zero-airport#:~:text=In%20June%202019%2C%20its%20members,%3B%20Develop%20your%20roadmap%3B%20Deliver.

This level of ambition and innovation for a zero-carbon future for the aviation sector and airports also needs to be supported for our Region's Airports through strong objectives, actions and funding mechanisms in the Regional Airport Programme and future reviews of National Aviation Policy.

There is a strategic opportunity for regional airports to play a key service role in the operation and maintenance of the growing Off-Shore Renewable Energy (ORE) sector. Each of our Region's airports are located close to ports and harbors and our marine resources that will enable the ORE sector.

In the recently published Draft Offshore Renewable Energy Development Plan (OREDP) II, Ireland is committed to decarbonising our energy system by 2050. Developing ORE is a positive proposition for the Region's economic development. ORE is a sector in which the Southern Region can position itself to be leader in nationally and internationally such are the resources and developing assets in the marine economy present in the Region. OREDP II has identified initial Broad Areas of Interest for ORE development which include Celtic Sea-East and Mid-West (Shannon/Foynes area) off the coast of the Southern Region. Future areas will also be assessed and identified.

Regional airports close to the ORE designated areas and port facilities have potential to develop future roles for servicing the sector such as hosting emergency services, business trips and transporting workers, experts and equipment. The opportunities should be further explored with the Department of Environment, Climate and Communications (DECC), thereby developing the opportunity for regional airports to assist Ireland to achieve its target for a net zero energy sector by 2050.

- **Recommendation 7: Net Zero Carbon Ambition and Targets for Airports and the Aviation Sector**
  (i): The Regional Airport Programme and future review of National Aviation Policy should seek and fund innovative actions in airports for their transition to a net zero carbon future. This may be through the continuation of existing funding streams such as the Public Policy Remit-Capital (PPR-C) , the Public Policy Remit-Operational (PPR-O) schemes and identifying further funding sources such as the EU Green Deal which places responsibility on the aviation sector to act. To meet our national Climate Action Plan targets and following international and European ambition, our Regions airports should clearly set their ambition to achieve net zero status for all airport operations by 2050. Leveraging the research and innovation capability within the Regions, partnerships should be encouraged with airport operators to test and pilot new technologies and energy sources for lower carbon air travel emissions.
  (ii): The Regional Airport Programme should support the strategic role our Region's airports can play to service the Offshore Renewable Energy (ORE) Sector. Our airport assets are located close to ports and the marine area where national policy under the Draft OREDP II has identified Broad Areas of Interest for ORE development which include Celtic Sea-East and Mid-West (Shannon/Foynes area) off the coast of the Southern Region. In servicing the ORE sector, our airports can play a significant contribution decarbonising our energy system by 2050. Consultation with DECC is encouraged to strengthen this potential role.

Conclusion
The SRA welcome this opportunity to make a submission on the mid-term review of the Regional Airport Programme. Regional airport policy strengthens regional economic development through our airport assets. In addition, it supports actions with airport stakeholders for lower carbon emissions from airport operations and the sector to meet Climate Action Plan targets.

Our recommendations aim to strengthen the Region's opportunities in the aviation sector through our existing airports of Cork, Shannon International, Kerry and Waterford. Our recommendations also aim to strengthen alignment of the Programme and future aviation policy with the RSES for the Southern Region, which shares the Department's goals to deliver enhanced regional connectivity, balanced regional economic growth and support direct access into the regions.

The SRA will welcome a follow up consultation with the Department on the final outcome of the review, the further development of national and regional airport policy and on the development of the Airport Strategy for the Southern Region under the RSES.

Mise le meas,

David Kelly
Director