



Tionól Réigiúnach
an Deiscirt

Southern Regional
Assembly

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15th January 2024

**Re: Submission to Public Consultation for Review of National Ports Policy
SRA File Ref: G 23/007**

A Chara,

The Southern Regional Assembly (SRA) welcome the Review of National Ports Policy, and the opportunity to make a submission on this important national policy document.

The SRA's submission is based on the Region's priorities as set out in the Regional Spatial and Economic Strategy for the Southern Region (RSES) and its implementation actions. The RSES sets a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development and aims for the Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions. The RSES is a key component of the implementation of Project Ireland 2040, including the National Planning Framework (NPF).

We commend the comprehensive Issues Paper for the consultation. The Paper highlights that a holistic approach is necessary to maximise efficiency and resilience of logistic chain planning and identifies how the various components of port activity interlink and affect each other. This submission should be read in conjunction with recent Regional Assembly responses to the following relevant consultations (which are also attached):



- Submission to National Industrial Strategy for Offshore Wind Consultation¹
- Submission to the South Coast Designated Maritime Area Plan (DMAP) Proposal²
- Submission on the All-Island Strategic Rail Review Consultation³

This response to the consultation provides the context of the RSES and a response to relevant areas outlined in the Issues Paper document prepared for the consultation.

1. CONTEXT FOR THE RSES

The RSES is set in the context of Project Ireland 2040 and the NPF which contains as its core objective a realignment in the spatial layout of the State with a 50:50% split in population and development between the Eastern and Midlands Region and the Southern and Northern and Western Regions. By 2040, the population of the Southern Region is projected to rise by up to 380,000 people (to almost two million) and employment is expected to increase by over 225,000 (to almost 880,000 employed) requiring infrastructure led planning. The RSES recognises the strategic role played by all areas in achieving regional and national targets outlined in the NPF. Achieving such ambitious core state targets will require an equally ambitious alignment in funding priorities and service delivery and an all of government approach.

The RSES economic strategy supports our Cities and Metropolitan Areas as economic engines of growth supported by the Atlantic Economic Corridor, Eastern Economic Corridor and a network of Key Towns and other towns and villages for an economically resilient region (urban and rural).

Our ports are fundamental to the achievement of core national and regional policy, they service the planned growth sustainably (population and employment) and they play a critical role in achieving our RSES Strategy outcomes for Sustainable, Planned and Infrastructure Led Development.

Section 6.3.4 of the RSES sets out Regional Policy Objectives to support the economic role of our ports for regional development. Of the five ports of national significance in the State, four are in the Southern Region (Tier 1 Ports of Cork and Shannon-Foynes and Tier 2 Ports of Waterford and Rosslare Europort). It is an objective of the RSES to support the achievement of Tier 1 status for the Ports of Waterford and Rosslare Europort.

The RSES provides significant support through Regional Policy Objectives (RPOs)⁴ for the sustainable development of our Region's port and harbour infrastructure, as well as marine economy development, transition to a net zero carbon energy future, and multi modal connectivity between

¹ <H:\Regional Planning\Hyperlinks\00 Submissions\2023\G 23006SRA-Response to National Industrial Strategy for Offshore Wind-7-11-23.pdf>

² <H:\Regional Planning\Hyperlinks\00 Submissions\2023\G 23004 SRA Submission to South Coast DMAP Proposal - 6-10-2023.pdf>

³ <H:\Regional Planning\Hyperlinks\00 Submissions\2023\22 GD001 SRA Response to All Island Strategic Rail Review - Consultation for SEA - 29-9-23.pdf>

⁴ <http://www.southernassembly.ie/uploads/general-files/Southern%20Regional%20Assembly%20RSES%202020%20High%20Res.pdf>

ports for freight and supply chain logistics. Regional Policy Objectives (RPOs) of direct relevance to the National Ports Policy development are set out below:

Relevant RPOs under Chapter 3 People and Places include:

- RPO 4 Investment Infrastructure, RPO 6 Collaboration between Metropolitan Areas, RPO 7 Delivery and Funding, RPO 8 Investment to Deliver the Vision for Metropolitan Areas, RPO 9 Holistic Approach to Delivering Infrastructure, RPO 11 Key Towns, RPO 30 Inter-Urban Networks.

Relevant RPOs under Chapter 4 A Strong Economy-Innovative and Smart include:

- RPO 40 Regional Economic Resilience, RPO 41 Atlantic Economic Corridor (AEC), RPO 42 Eastern Corridor, RPO 51 Economic Clusters and Ecosystems, RPO 68 Regional Investment, RPO 75 Anticipating Economic Structural Changes, RPO 76 Marine Economy, RPO 77 Maritime Spatial Planning – Consistency and Alignment, RPO 78 First Mover under the National Marine Planning Framework, RPO 79 Shannon Estuary and other Harbour Plans, RPO 80 Marine Resource and Blue Economy, RPO 81 Fishery Harbour Centres and Local Authority Harbours, RPO 82 Seafood Sector, RPO 83 Island and Coastal Communities, RPO 84 Fishing Local Area Groups (FLAG) Development Strategies, RPO 85 Renewable offshore Energy, RPO 86 Marine Cluster.

Relevant RPOs under Chapter 5 Environment include:

- RPO 95 Sustainable Renewable Energy Generation, RPO 98 Regional Renewable Energy Strategy, RPO 99 Renewable Wind Energy, RPO 100 Indigenous Renewable Energy Production and Grid Injection, RPO 101 International Hub for Energy Innovation, RPO 90 Regional Decarbonisation, RPO 91 Decarbonisation in the Transport Sector.

Relevant RPOs under Chapter 6 Connectivity include:

- RPO 139 Low Carbon International Connectivity, RPO 140 International Connectivity, RPO 142 Ports, RPO 143 Ports and Airports, RPO 144 Port Infrastructure, RPO 145 Ports and Harbour Strategy for Southern Region, RPO 146 High Quality International Connectivity Ports, RPO 147 Economic Opportunities of Ports, RPO 166 Investment in Strategic Inter Regional Multi-Modal Connectivity to Metropolitan Areas and Economic Corridors.

Relevant Metropolitan Area Strategic Plan (MASP) Objectives include:

- Cork MASP Policy Objective 13 Port of Cork, Limerick-Shannon MASP Policy Objective 16 Shannon Foynes Port, Waterford MASP Policy Objective 15 Port of Waterford.



2. KEY CONSULTATION RESPONSES

The Issues Paper seeks feedback on 12 areas of opportunity and challenge for Irish Ports. Themes include Climate Change, Development of Offshore Renewable Energy, Integrated logistics Chain, Transition to the Circular Economy, Port Capacity, Ports Funding, Technological Innovation, Upskilling and Diversifying the Maritime Labour Force, Governance, Accessibility, Enhancing Ireland's Maritime Connectivity, and Ports Marine Code.

This section addresses the questions under the relevant theme and highlights supportive work being undertaken in the Implementation of the RSES.

2.1 RSES Implementation

RSES implementation initiatives that will complement the development and implementation of the new National Ports Policy include:

- A '**Ports and Harbour Strategy for the Southern Region**' is being developed in accordance with RPO 145 of the RSES. The SRA will procure specialists in Q1 2024 to work on a socio-economic impact analysis of our ports and harbours and related sectors on the region's economy and potential growth to drive regional economic development. This work will provide an evidence base for recommendations to National Ports Policy review and assist business cases for investing in port infrastructure. This study will include an assessment of EU good practices with regards OWE supply chains. The SRA will continue to consult with DOT in the preparation of this analysis which is considered of significant relevance to the development of ports policy.
- The SRA in conjunction with the Department of Environment, Climate and Communications, SEAI and the other Assemblies are developing a **Regional Renewable Energy Strategy Roadmap and Strategy** under the Climate Acton Plan. In addition, the SRA have secured support from ESPON (EU Programme conducting EU territorial analysis) to conduct a case study on decarbonisation in the Region. This analysis will support the development of a Regional Decarbonisation Plan. Harnessing the potential of OWE and associated renewable energy production in the Region, including Green Hydrogen, is a strategic opportunity.
- A **Smart Southern Region Action Plan** is programmed to be developed in 2024. There may be significant potential for project collaborations with other stakeholders and innovation actors to test and pilot projects for alternative green fuels for shipping, development of Port Community Systems, and cyber-security of the ports in the region. Such pilots, and their outcomes, can function as a demonstration of a green and innovative region in action. This programme can assist ports with opportunities and challenges outlined in section 7 Technological Innovation of the Challenges and Opportunities set out in the Issues Paper for Ports Policy.



- A **Regional Freight Strategy** will be developed by the NTA and SRA following the adoption of the National Demand Management Strategy in 2024. This Strategy will include consideration of rail freight, the asset of the Region's rail network and innovations in the freight handling and transport sector potential for electrification, lower carbon fuels and technology.

The above areas of work are aligned with the themes of Climate Change, Development of Offshore Renewable Energy, Integrated logistics Chain, Transition to the Circular Economy, Port Capacity, Ports Funding, and Technological Innovation from the Issues Paper.

Recommendation:

1. The SRA recommend that the DOT continue to collaborate with the Regional Assembly to ensure these emerging areas of work are in alignment and complementary.

2.2 Climate Change and Development of Offshore Renewable Energy

It is recognised that ports are in a challenging position, on the one hand port activities are likely to expand due to a growing population, on the other ports and shipping simultaneously need to play a role in decarbonizing the Irish economy.

Key areas where ports can contribute to the climate action are reducing emissions from transport, delivery of ORE, and supporting a just transition. Delivery of reduced emissions from transport is discussed under the theme of 'Integrated Logistics' below and a just transition is discussed under the theme of 'Enhancing Irelands Maritime Connectivity'.

With regards to the delivery of ORE, a recent report⁵ to the House of the Oireachtas (March 2023) on the delivery of offshore renewable energy recommended that Ireland adopt a multi-port approach and will need to build, on a phased basis, around four standard ORE port facilities (each capable of building 500 MW of ORE annually) that will act as construction and deployment ports over the next 25 - 30 years. In addition, several smaller ports will be required for ORE operation and maintenance activities.

The report also highlighted that that the state's electricity demand will triple between now and 2050, as we electrify heat and transport provision. Around 25 GW per annum of offshore wind energy purely for domestic purposes will be required. The export potential opportunity is estimated at around 70 GW to 80 GW of capacity.

The Regional Assembly has recently made submissions to the Department of the Environment, Climate and Communications (DECC) for the South Coast DMAP and to the Department of the Enterprise, Trade and Employment (DETE) on the National Industrial Strategy for Offshore Wind consultations. These

⁵https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_enterprise_trade_and_employment/reports/2023/2023-03-08_report-on-offshore-renewable-energy_en.pdf



submissions highlight opportunities and approaches to realise the potential for offshore renewable energy in a sustainable way including:

- Support development of ORE in the Southern Region to align with core Project Ireland 2040 and NPF growth strategy,
- Build on the regions strengths and align with national and regional Smart Specialisation Strategies,
- Invest in the region's ports, Higher and Further Education Institutes, and infrastructure project.
- Ensure a whole of government approach, and
- Development should be plan led and provide real opportunities for just transition and new employment in emerging sectors.

Recommendations:

1. The development of Ports policy should align with core national policy as contained in Project Ireland 2040 and the NPF.
2. The review should take account of recent SRA submissions on South Coast DMAP and the National Industrial Strategy for Offshore Wind including the points raised above.
3. Adopt a whole of government approach across complementary policies, strategies and plans that will support growth of Ports (Designated Maritime Area Plans, National Hydrogen Strategy, All Island Rail Review, Regional Freight Strategies inter alia).

2.3 Integrated Logistics

Ports can also play a crucial role in the delivery of national climate targets set out in the Government's Climate Action Plan and Ireland's EU climate commitments, through reducing emissions from transport movements to and between ports.

To ensure the potential of the ports in the Southern Region can be realised in a sustainable way the **Metropolitan Area Transport Strategies** for Cork, Limerick-Shannon, and Waterford should be delivered. Investing and delivering on transport infrastructure projects, especially rail infrastructure, identified in each of these transport strategies is an objective of the RSES and MASPs for Cork, Limerick-Shannon, and Waterford. These priorities and infrastructure requirements can support economic growth of the region with efficient and sustainable logistics and supply chain networks. It is important to support the delivery of guaranteed journey times between cities, Key Towns, ports, and airports which are strategic nodes on the Trans European Network Core and Comprehensive Network that connect our State and Regions to Europe.

Our submission to the All-Island Rail Review highlighted that there is a strategic opportunity to increase rail freight in our transport systems, especially connecting our Tier 1 and Tier 2 Ports and by the reactivation of closed or disused rail lines. Opportunities for the Region include:



- Re-instate the Limerick – Foynes Freight Line.
- Strengthen freight and logistics at Rosslare and Waterford/Belview ports with improved rail connectivity to both ports.
- Deep water wharf and rail connection at Marino Point in Cobh as part of the Port of Cork.
- Provision of multi-modal freight interconnection and break-bulk distribution centres, where freight is transported via zero carbon emission options on approach and within our cities and urban centres.

The SRA welcome the recommendations in the All-Island Rail Review by DOT to commit to delivering the infrastructure to operate a net zero emissions network by 2050 and the commitment to roll out electrification of rail lines (inter-city) and explore other options such as battery and hydrogen for regional services. The SRA would also welcome recommendations for incentivising rail freight for commercial use as an alternative to road use by lowering track access charges.

An all-government approach or framework which allows national logistics policy to be developed in an integrated manner and not as the sum of sector development plans could have huge benefits. It is noted that the Irish Maritime Directorate (IMD) has established a Ports Co-Ordination Group and the national maritime Facilitation (FAL) committee to mainstream stakeholder engagement. The Ports Co-Ordination Group has been set up with the Ports and representatives from key departments to ensure policy alignment and progress of port projects. The maritime FAL committee was established to provide a forum for maritime transport facilitation issues to be raised, to explore and adopt ways of addressing or resolving them.

Recommendations:

1. The review should take account of the SRA's submission to the All-island Rail Review including the points made above.

2. Capital investment to the Southern Region for infrastructure projects, especially for ports and harbours, connectivity (multi modal road and rail and digital) and transport led land use planning for ports to enable their growth. This recommendation is complementary to the aims of Ireland's Road Haulage Strategy 2022-2031 and the All-Island Strategic Rail Review.

2.4 Transition to a Circular Economy

Ports in the Southern Region can shift towards a circular economy by implementing measures such as:

- Collaboration and Partnerships: Foster collaboration between ports, businesses, and local stakeholders to create a circular economy ecosystem. Form partnerships with waste management companies, recycling facilities, and innovative startups to promote the exchange and reuse of materials within the port area.



- Circular Supply Chains: Encourage businesses operating in and around the ports to adopt circular business models. Provide support and incentives for companies to implement sustainable practices such as product life extension, repair and refurbishment, remanufacturing, and reverse logistics.
- Bioeconomy Clusters: Support SMEs and entrepreneurs that create emerging bio-based products and materials from marine materials and seafood by-products through clusters such as the Circular Bio-Economy South-West and Irish BioEconomy Foundation.

Under RPO 56 the RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund. It is also an objective of the RSES to support economic clusters and ecosystems under RPO 51.

Recommendations:

1. The review should promote smart specialisation approaches, economic clusters, and ecosystems which facilitate the transition to a low carbon future.

2.5 Port Capacity

The expansion at existing ports to address future capacity deficits should be the preferred approach. The ports in the southern region are well located by reference to existing demand but importantly to stated core national policy with significant potential for expansion. Expansion of these ports through delivery of port infrastructure and services can enable achievement of national and regional policy objectives for targeted population and employment growth in the Region in a sustainable and infrastructure led manner and support the Region's transition to a zero-carbon future.

The 2022 census data highlights a shortfall of population growth in the Metropolitan areas in the Southern Region (Cork 58%, Limerick/Shannon 60%, and Waterford 55%). There is a need for combined effort across the state to achieve core national policy for balanced regional development. The delivery of new port capacity in the southern region can aid regional parity and reduce pressure on Dublin thereby achieving overall national policy. Such an approach would align with national, regional, and local planning and economic policy.

The Ports of Rosslare, Waterford, Cork and Shannon-Foynes all have strategies in place to expand and meet future shipping and renewable energy opportunities. It is an objective of the RSES under RPO 142 to support the achievement of Tier 1 status for the Ports of Waterford and Rosslare Europort. There is planned infrastructure improvements to better serve and facilitate development of the existing key ports in the Southern Region including the:

- N21/N69 connecting port of Foynes to the Motorway Network,
- N11/N25 linking Rosslare Europort/Wexford with both Dublin via the M11 and Cork/Waterford via the N25.



- M28 Cork to Ringaskiddy Project to support the strategic development of the Port facilities at Ringaskiddy, and
- Strengthened rail connectivity to these ports as set out in Recommendation 23 of the All-Island Strategic Rail Review.

National policy should prioritise the development of these ports as opposed to development of new locations.

The success of expansions in port capacity will also be dependent on how development is delivered. The Southern Region with its Port assets and OWE resources has considerable potential to attract inward investment, skills, and talent. To be competitive our Region must be an attractive place to live, work, and play. Key to this will be delivering balanced regional development under the NPF and NDP, investing in the infrastructure (especially supporting sustainable port development and multi modal connectivity to and between our ports). Government should be prioritising the Southern Region in these terms. Expansion of the existing ports in the Southern Region can support economic development, vibrancy, and employment opportunities for our Region's settlements.

Recommendation:

1. Capital investment in enabling infrastructure to develop our place-based assets (our Cities and Metropolitan Areas, Key Towns, Ports and Harbours, strategic locations along our economic corridors of the Atlantic Economic Corridor and Eastern Seaboard Corridor to Rosslare Europort and the Port of Waterford) to support expansion.
2. The policy should ensure that ports development is infrastructure and plan led, guided by sustainable land use and transportation planning principles to consolidate the economic function of the Region's settlements.
3. Support the achievement of Tier 1 status for the Ports of Waterford and Rosslare Europort.

2.6 Ports Funding Initiatives

Tier 1 and Tier 2 ports may be able to access 'CEF Transport' funding which is part of the EU's Connecting Europe Facility (CEF). This fund also has grant programmes for telecom and energy infrastructure. CEF Transport specifically acts as a financing instrument to support the improvement and strengthening of the Trans-European Network for Transport (TEN-T). Within the TEN-T, nine core network corridors have been defined, encompassing roads, waterways, railways and crucial airports and airports. Grant amounts may vary depending on the type of project. For study projects ("Studies", possibly with pilot activities) the grant reimburses up to 50% of the project costs. For implementation projects ("Works") the grant reimbursement can be up to 30%, or even 50% in case of cross-border projects.



Another example of a funded initiative that has potential to improve the OWE supply chain is Enterprise Ireland's [Smart Regions Enterprise Innovation Scheme](#) supported under the Southern, Eastern and Midland Regional Programme 2021-2027⁶. This Scheme is seeking projects that support the development of innovative services through local infrastructure, innovation clusters, services to SME's, early-stage feasibility, and priming research that align with the actions outlined in the Regional Enterprise Plans. Each of the Regional Enterprise Plans in the Southern Region support enterprise growth from renewable energy and OWE especially. This funding call will be a stimulus for enterprise actions and partnerships between enterprise agencies, research and innovation centres and industry. Learning from the outcomes of this funding call should inform implementation of the strategy. In addition, funding may also be available from 'Project Ireland', 'Horizon', and other EU Instruments to support the goals of the 'Green Deal' to further RD&I activities and development of market ready solutions.

Further sources of funding may be necessary for ports to realise their potential and necessary to capture the economic benefits of delivering on new sources of renewable energy. The matter of Ports Funding will be considered through the Socio-Economic Impact Analysis of Ports to be undertaken by the Southern Regional Assembly and the results shared with the DOT.

Recommendations:

1. The DOT should continue to collaborate with the SRA on the Socio-Economic Impact Analysis of Ports to assist in the development of a value case for ports to progress projects.

2.7 Upskilling and Diversifying the Maritime Labour Force

The RSES supports the development of a Learning Region and as set out in the 'Towards A Learning Region'⁷ paper prepared by the SRA, seek a collaborative approach to regional skills development, aligned to the needs and opportunities of regional economies. Consistent with these objectives, a significant strengthening is needed in our higher and further education sectors at regional level. With the support of the State, Higher Education Institutes, Further Education, learning and skills development through Regional Skills Forums can nurture research and innovation, enterprise creation, skills, and talent to support ports and ensure they have the skills necessary for the digital transformation of the sector.

Through support of initiatives delivered through the SRA, projects could be encouraged to coalesce around digital transformation of ports, supported by policy through Smart Specialisation S3 initiatives, with capacity built through learning region supports, and with funding and public investment from the State and EU.

⁶ <https://www.southernassembly.ie/eu-programmes/sem2127>

⁷ [Towards a Learning Region](#)



Recommendation:

1. Invest in our Region's Higher and Further Education Institutes and relevant skills development (recommendations of the SRA's Towards a Learning Region) to grow employment opportunities in the sector.
2. Facilitate regional approaches to S3 which can support the development of the skills necessary for the digital transformation of the sector.

2.8 Enhancing Irelands Maritime Connectivity

As highlighted in the Issues Paper, port development projects are often contested and a port's ability to engage early and meaningfully with its stakeholders including impacted communities will be central to its ability to develop. Our experience from the recent DMAP consultation process highlighted that communities support just transition initiatives and would like to see more State led initiatives and ownership, not just private sector driven, to ensure the economic uplift from port expansion benefits local to coastal communities. Such approaches can improve the visibility of the ports and shipping sector in the mind of the public. It is an objective of the RSES under RPO 83 to support investment which strengthens and sustainably grows coastal and island communities. It is also an objective to seek the implementation and investment in actions that support the Fishing Local Area Group (FLAG) Development Strategies under RPO 84.

Recommendation

1. For our network of coastal and rural towns, it is important that direct and indirect enterprise growth through increased port activity, provides real opportunities for just transition and new employment. It is important that the ports develop in a manner that generates economic uplift and vibrancy for our coastal towns and communities.

3.0 CONCLUSION

The SRA welcome this opportunity to make this submission. Developing our regions ports is a significant opportunity for regional economic development in addition to achieving our national target for a zero-carbon energy system by 2050 to meet our Climate Action commitments and is a key objective of the SRA. The recommendations, aim to highlight the Region's opportunities, support the consultation process, and facilitate port development in the Southern Region.



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The SRA welcome follow up consultation and look forward to further engagement on the strategy and other areas of mutual interest including our upcoming work on socio-economic impact analysis of our ports and harbours.

Mise le meas,

A handwritten signature in blue ink, appearing to read "David Kelly".

David Kelly

Director, Southern Regional Assembly