



Northern & Western
Regional Assembly

Submission on the review of the National Ports Policy January 2024



Rialtas
na hÉireann
Government
of Ireland

Tionscadal Éireann
Project Ireland
2040

The Northern and Western Regional Assembly welcomes the opportunity to provide input into the review of the National Ports Policy.¹ Given the importance of our port network in facilitating trade, managing marine resources and in supporting Ireland’s transition to a low carbon society, it is imperative that the National Ports Policy is updated to focus on the new opportunities and challenges being experienced by our ports and coastal communities. This topic is of particular importance to the Northern and Western Region of Ireland, with the region home to a number of “Ports of Regional Significance” – including the Port of Galway, Killybegs Harbour and Ros An Mhíl – as well as other important fisheries ports including – but not limited to – Sligo Port and Greencastle.

These ports contribute greatly to the collective development of the Northern and Western Region of Ireland across a wide range of areas. The Port of Galway caters for core cargo-related shipping operations and cruise shipping, with the port also having a significant and growing business in the import of wind energy materials, including turbine blades, tower sections and other relevant components. Consultations with the Port of Galway show that it has emerged as a major port for the deployment of onshore wind and that between the summer of 2022 and 2024, four onshore wind projects with a total capacity of around 350MW will be deployed through the Port of Galway. Other materials that are imported through the Port of Galway include oil and bitumen and its principal exports include refuse-derived fuel, scrap steel and limestone. The Port of Galway is also the port of choice for cargo services to the Aran Islands, which involved 147 sailings in 2023,² while a passenger ferry service also operates between the Port and the Aran Islands.

Killybegs is the leading fishery port in Ireland, accounting for 65 per cent – or 102,731 tonnes – of fish landings in Ireland by Irish vessels, while accounting for 76 per cent – or 84,281 tonnes – of fish landings in Ireland by foreign vessels in 2022.³ As well as this, Killybegs also services other commercial activity associated with the oil and gas industry, the tourism industry and the onshore renewable energy industry, with the harbour considered to have significant potential in supporting offshore wind energy developments off the coast of the Northern and Western Region of Ireland, particularly opportunities regarding floating wind turbines.⁴

Ros An Mhíl is designated as one of the country’s six major fishery harbour centres and it is an important ferry port for passengers and goods for the Áran Islands, with the harbour considered to have potential in collaborating with neighbouring ports in supporting staging activities of offshore wind energy projects off the coast of the Northern and Western Region of Ireland.

¹ <https://www.gov.ie/en/consultation/a4e49-public-consultation-for-review-of-national-ports-policy/>

² Source of information is Port of Galway

³ <https://www.cso.ie/en/releasesandpublications/ep/p-fi/fishlandings2022/>

⁴ <https://windenergyireland.com/images/files/final-national-ports-study.pdf>

Although the significance of Sligo Port – in national terms – may be relatively low, it remains important from a regional and local economic perspective, supporting local industry and providing an transportation facility, with the primary cargoes being shipped to the port including coal, slack, timber and fish meal, with metal scrap being the main export. Greencastle, like Ros An Mhíl, is one of the country’s top ten ports for fish landings, is an important ferry port to Northern Ireland, and is home to BIM’s National Fishery College. It also provides cruise liners with a safe and accessible location for berthage that provides access to the North West Region, including north Donegal and the North West City Region (Letterkenny/Derry/Strabane).

Given the role of these ports in facilitating economic activity, their continued development is crucial for the Northern and Western Region of Ireland particularly considering the underperformance of the region’s economy in recent years, with this underperformance leading to rising regional inequalities in Ireland. These rising inequalities is evident from the latest data in terms of disposable income per head of population⁵ and in terms of population trends.⁶ As of 2021, disposable income per head of population in the Northern and Western Region of Ireland was estimated to be 84 per cent of the State average in 2021, with the corresponding ratio for the Eastern and Midland Region – which acts as the leading NUTS 2 Region in Ireland from an economic perspective – amounting to 109 per cent of the State average. As such, the gap between the Northern and Western Region – as a percentage of the State average – and the Eastern and Midland Region was 25 percentage points in terms of disposable income per head of population, which was much wider than the corresponding gap in 2010 – which was 10 percentage points – and in the mid to late 2000s, where such a gap ranged from 11 to 14 percentage points.

Likewise, the Eastern and Midland Region accounted for 55 per cent of all population growth in Ireland between 2016 and 2022, with the Northern and Western Region and the Southern Region collectively accounting for 45 per cent of growth during this time period. Given that the National Planning Framework (NPF) acknowledges that the Greater Dublin Area – and to a lesser extent the wider Eastern and Midland Region – has witnessed an overconcentration of population, homes and jobs – it clear that the distribution of this growth is contrary to the vision and objectives of the NPF, specifically National Policy Objective (NPO) 1a which aims to ensure that the “projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined”.⁷

The review of the National Ports Policy has the potential to assist in addressing these challenges, reducing regional disparities in Ireland, supporting regional equity and the delivery of “better balanced” regional development in line with the vision and objectives of the NPF and the Regional Spatial and Economic Strategy (RSES)⁸ of the Northern and Western Region. The RSES of the Northern and Western Region is a statutory policy and investment framework which acts as the regional implementation of the NPF in the region. It aims to accommodate the Northern and Western Region’s future population and employment growth in a manner which is sustainable and allows the region to provide a credible counterbalance to the economic trajectory of the Greater Dublin Area. Given the importance of ports in supporting economic development, such a review provides an opportunity to strategically position and support the ports of the Northern and Western Region of Ireland to capitalise on economic opportunities related to international trade, offshore and onshore wind energy, the blue economy and the cruise industry, supporting the development of balanced regional development in line with the NPF and the RSES of the Northern and Western Region.

⁵ <https://www.cso.ie/en/releasesandpublications/ep/p-cirgdp/countyincomesandregionalgdp2020/data/>

⁶ <https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/populationchanges/>

⁷ <https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

⁸ <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf>



Within this context – and having considered the relevant consultation questions⁹ in the Department’s issues paper – the Northern and Western Regional Assembly has made a series of recommendations for consideration in the review of the National Ports Policy, namely:

1. Develop a “Regional Ports Programme” to allow exchequer funding to be used to support the development of “Ports of Regional Significance” and other ports located along the coast of the Northern and Western Region of Ireland, with a particular focus on developing the region’s offshore and onshore renewable energy sector, trading sector, cruise tourism and the blue economy.
2. Designate the fishery ports located in the Northern and Western Region of Ireland with a multi-purpose role.
3. Prioritize the development of strategic infrastructure projects in Killybegs Harbour, Port of Galway and Ros an Mhíl that will support the development of the offshore and onshore renewable energy sector, thereby supporting “Regional Policy Objective” (RPO) 4.33 of the RSES of the Northern and Western Region of Ireland.
4. Support the development of strategic infrastructure projects in all ports in the Northern and Western Region of Ireland that will improve climate resilience, support environmental sustainability, reduce the associated carbon footprint of these ports and prepare the ports for the transition to a low carbon economy.
5. Allow “Ports of Regional Significance” and other ports located along the coast of the Northern and Western Region of Ireland to apply for funding under the European Regional Development Fund (ERDF) for the next EU funding period of 2028-2035.
6. Provide exchequer funding to ports to resource EU project officers, as a means of improving their bidding capacity in applying for funds under the EU’s Connecting Europe Facility and other appropriate EU funding programmes.
7. Mandate the Ireland Strategic Investment Fund (ISIF) to invest in strategic infrastructure projects in all ports located along the coast of the Northern and Western Region of Ireland, with a particular focus on developing the region’s offshore and onshore renewable energy sector, cruise tourism and the blue economy.
8. Explore how the ports located on the coast of the Northern and Western Region of Ireland can capitalise on the potential opportunities related to the development of the hydrogen economy.
9. Strategic port projects in the Northern and Western Region of Ireland – which are proven to be of high value to society – should be considered for exchequer and EU funding.
10. Prioritize the proposed relocation and expansion of the Port of Galway, thereby supporting RPO 4.36 of the RSES of the Northern and Western Region of Ireland.
11. Examine the potential of the Northern and Western Region’s other main ports to expand and enhance facilities to enable them to become ports with enhanced regional significance in a range of areas, including trade, fisheries, marine tourism and renewables, thereby supporting the delivery of RPO 4.37 of the RSES of the Northern and Western Region of Ireland.
12. Support the development of data driven technology, sensors and the IoT in the ports of the Northern and Western Region of Ireland, allowing them to become “Smart Ports” in line with RPO 6.4 of the RSES of the Northern and Western Region of Ireland.
13. The performance of ports should be examined on a wide range of economic and environmental metrics.

⁹ <https://www.gov.ie/en/consultation/a4e49-public-consultation-for-review-of-national-ports-policy/>

Figure 1: Ports located along the coast of the Northern and Western Region of Ireland



Source: RSES of the Northern and Western Region of Ireland



The Northern and Western Regional Assembly consider that the implementation of the recommendations contained within this submission are justified from policy, economic, infrastructure and sectoral perspective. Section 2 of this submission will provide an extensive evidence base which shows the importance of further developing the ports infrastructure of the Northern and Western Region of Ireland.

2.1: Delivery of Project Ireland 2040

By 2040, Ireland's population is expected to increase by around 1 million, requiring an estimated 660,000 new jobs and 500,000 new homes during this period.¹⁰ In the Northern and Western Region alone, population projections suggest that there will be between 160,000 and 180,000 additional people living in the region by 2040, requiring an estimated 115,000 new jobs. Managing this significant growth in a sustainable and equitable manner will be instrumental to supporting the economic and social wellbeing of all regions in Ireland. In this context, Project Ireland 2040 – through the NPF and the RSES¹¹ – provide holistic investment frameworks that will manage future population and employment growth and support effective regional development in Ireland, as the Greater Dublin Area – historically speaking – has witnessed an overconcentration of population, jobs and homes. The consequences of these historical trends have been reflected in the European Commission's "2023¹² Semester Country Report – Ireland", with the commission noting that regional inequalities in Ireland remain high and are increasing. If these unsustainable trends remain unchecked, it will have a damaging impact on the economic and social wellbeing of all regions in Ireland, particularly rural oriented regions such as the Northern and Western Region.

Therefore, the delivery of the vision and objectives of the NPF and the RSES of the Northern and Western Region could not be more important. Launched in 2020, the RSES of the Northern and Western Region – for the first time – brings together spatial planning and economic policy to provide a long term, statutory, strategic investment framework for the region, which will assist in the implementation of the NPF in the region. By focusing on a wide range of interconnected strategic areas – such as population growth, sustainable housing patterns, transport mobility, health, education and social services, climate change and economic development – the RSES of the Northern and Western Region collectively identifies the region's assets, opportunities and challenges, providing overarching policy responses in the form of "Regional Policy Objectives".

¹⁰ <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

¹¹ RSES of the Northern and Western Region available through the attached link: <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf>

¹² https://economy-finance.ec.europa.eu/system/files/2023-05/IE_SWD_2023_607_en.pdf

In doing so, the RSES of the Northern and Western Region aims to achieve sustainable population and employment growth up to 2032, while supporting the Assembly’s ambitions to become a region that is “**Vibrant**”, “**Natural**”, “**Connected**”, “**Inclusive**”, has high-quality “**Infrastructure**”, and is consolidated by a settlement strategy focusing on ‘**People and Places**’. Furthermore, the RSES of the Northern and Western Region outlines specific population targets for the region, namely:

- ◆ Grow the population of the Northern and Western Region of Ireland by between 160,000 and 180,000 people by 2040, in line with the NPF.
- ◆ Grow the employment base of the Northern and Western Region of Ireland by 115,000 people by 2040, in line with the NPF.
- ◆ Grow the population of Galway City and Suburbs by between 50% and 55% by 2040.¹³
- ◆ Grow the population of Sligo Town, Letterkenny and Athlone by 40% by 2040.¹⁴
- ◆ Grow the population of the Tuam, Ballinasloe, Castlebar, Ballina, Roscommon Town, Carrick-on-Shannon, Cavan Town and Monaghan Town by 30% by 2040.

Central to achieving these ambitions and population growth targets will be the continued development of the ports of the Northern and Western Region of Ireland, given their role in supporting and generating economic development. For this reason, the Northern and Western Regional Assembly included a number of “Regional Policy Objectives” (RPO) in the RSES as a means of supporting economic development in the region. These include:

- ◆ RPO 4.31 which aims “To protect, upgrade and expand our key Fisheries Ports of Killybegs, Greencastle and Ros an Mhíl, and to ensure adequate continued investment in facilities to ensure their ongoing success.”
- ◆ RPO 4.32 which aims “To enable the expansion of our regional assets in the Blue Economy in the following sectors: Marine research and innovation, Gas and Oil deposits within Irelands waters, Seafood innovation through Greencastle, Killybegs, Pairc Na Mara and other BIM fishery centres.”
- ◆ RPO 4.33 which aims “To facilitate where possible Marine Renewable Technology Projects off the West and North West coasts of Ireland, and subject to environmental and amenity considerations (feasibility studies), and where applicable, enable National Grid connection.”
- ◆ RPO 4.34 which aims “To enable the development (and/or expansion) of a number of strategic Marine Resource Innovation Parks, including locations at Greencastle, Killybegs, Co. Donegal and Cill Chiaran, Co. Galway, (Pairc na Mara), to increase aquaculture and seafood sectoral growth in the Marine Economy.”
- ◆ RPO 4.35 which aims “To support the ongoing upgrade and improvement of the region’s harbours and ports, and ensure the sustainable development of this infrastructure to enable aquaculture and seafood industry expansion responsively.”
- ◆ RPO 4.36 which aims “To support the sustainable expansion and upgrade of Galway Harbour and Galway Port as part of the overall vision to grow Galway as a City Region, subject to visual, transport and economic viability considerations and in compliance with the EU Habitats Directive (which may necessitate consideration of IROPI”).
- ◆ RPO 4.37 which aims “To examine the potential of the region’s other main ports to expand, and enhance facilities to enable them to become ports with enhanced regional significance in a range of areas, including trade, fisheries, marine tourism and renewables. This will be done in conjunction with all relevant stakeholders, including the relevant Local Authorities, and within the context of the NMPF”.
- ◆ RPO 6.2 which aims to “Support, enhance and enable investment in the development and diversification of our network of key Airports and Seaports/ Harbours, providing them with adequate and efficient capacity and ensuring they have high-quality sustainable transport connectivity, including road, rail, cycling and pedestrian infrastructure, as appropriate and subject to environmental considerations.”
- ◆ RPO 6.3 which aims to “Support the development and the protection of the fisheries harbours in the context of Brexit and its effect on waters available for Irish trawlers to fish.”
- ◆ RPO 6.4 which aims to “Support the development of utilisation of data and insight-driven technology, sensors and the IoT in our airports, seaports/harbours in their transition towards becoming Smart Ports.

¹³ Relative to a base year of 2016

¹⁴ Relative to a base year of 2016

2.2: Rising Regional Inequalities

One of the most important metrics in determining the economic performance of a geographical area is disposable income per head of population, namely resident's income after taxes and social contributions. Such an indicator captures the economic wellbeing of residents in a region and is unaffected by factors which have distorted regional GDP statistics in Ireland in recent times.

Based on the latest available data regarding disposable income per head of population,¹⁵ it is clear that regional inequalities in Ireland have been rising in recent years. As evident from Figure 2, disposable income per head of population in the Northern and Western Region was estimated to be 84 per cent of the State average in 2021, with the corresponding ratio for the Eastern and Midland Region – which acts as the leading NUTS 2 Region in Ireland from an economic perspective – amounting to 109 per cent of the State average. As such, the gap between the Northern and Western Region – as a percentage of the State average – and the Eastern and Midland Region was 25 percentage points in terms of disposable income head of population, which was much wider than the corresponding gap in 2010 – which was 10 percentage points – and in the mid to late 2000s, where such a gap ranged from 11 to 14 percentage points.

Such trends can be credited to the fact that year-on-year growth rates in disposable income levels in the Eastern and Midland Region have consistently outperformed the equivalent rates in the Northern and Western Region over the past 10 years. Between 2012 and 2021, the average annual growth rate in disposable income per head of population in the Eastern and Midland Region amounted to 3.9 per cent, which was higher than the equivalent rate for the Northern and Western Region, which was 2.5 per cent during this time. Such findings are in line with the latest European Commission's Country Report on Ireland for 2023.¹⁶ In their assessments, the European Commission noted that "internal regional disparities remained high in Ireland" with the report noting that there is "stark differences in disposable income of households across regions", with various factors – ranging from innovation capabilities, productivity levels to accessibility issues – likely to explain why these regional disparities are quite large.

Furthermore, the latest available Eurostat data¹⁷ shows that disposable income levels in the Northern and Western Region were also underperforming compared to European norms, particularly when compared to previous years. In this regard, the Eurostat data shows that disposable income per head of population in the Northern and Western Region was 76 per cent of the EU27 average in 2020, which was notably lower compared to the corresponding rate of 92 per cent in 2010 and lower compared to rates found in the period of 2003 to 2009, when the region's disposable income levels were generally between 83 and 93 per cent of the EU27 average.

¹⁵ <https://www.cso.ie/en/releasesandpublications/ep/p-cirgdp/countyincomesandregionalgdp2020/data/>

¹⁶ https://economy-finance.ec.europa.eu/system/files/2023-05/IE_SWD_2023_607_en.pdf

¹⁷ <https://ec.europa.eu/eurostat/web/regions/data/database> Purchasing Power Standard (PPS)

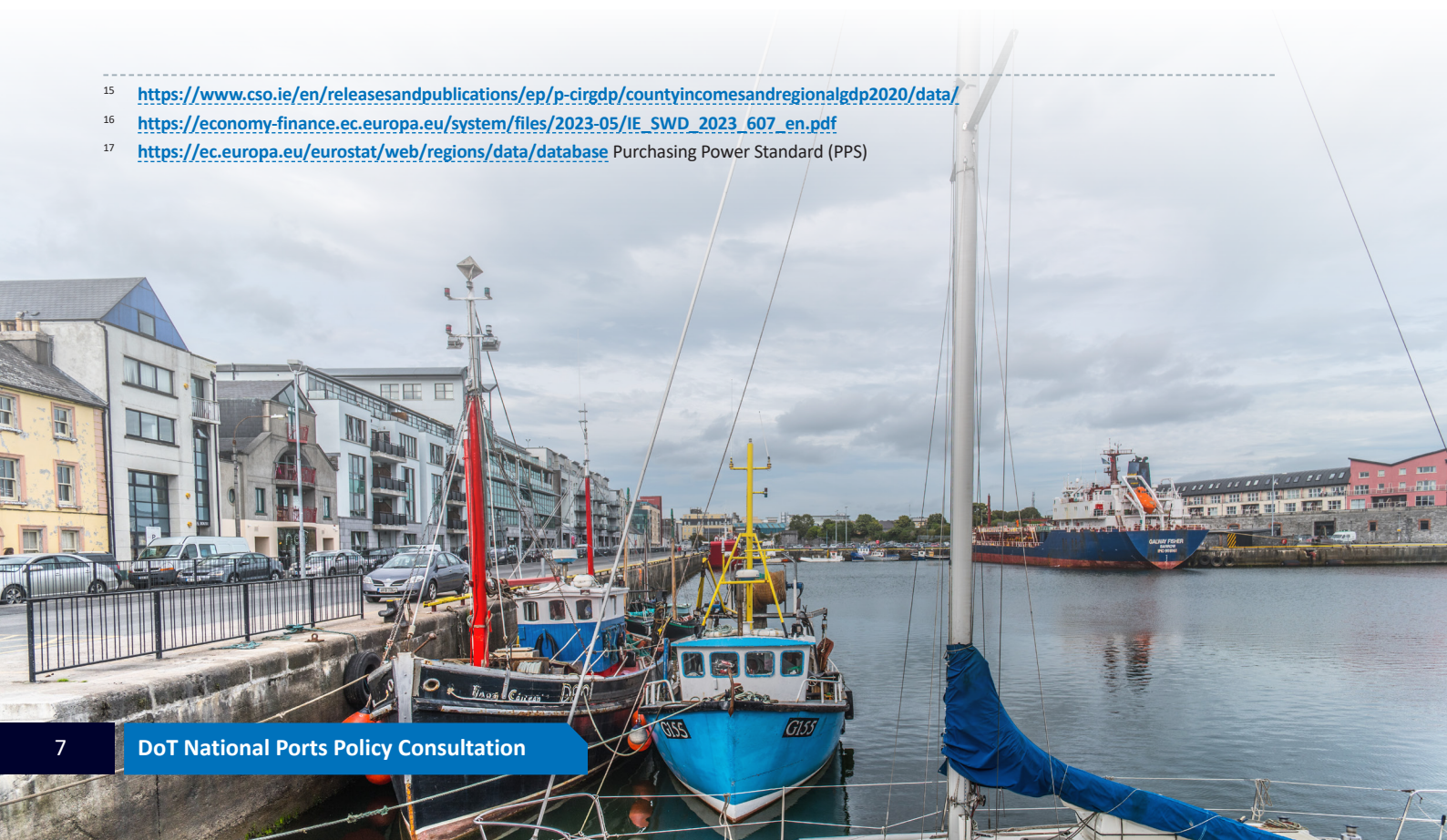
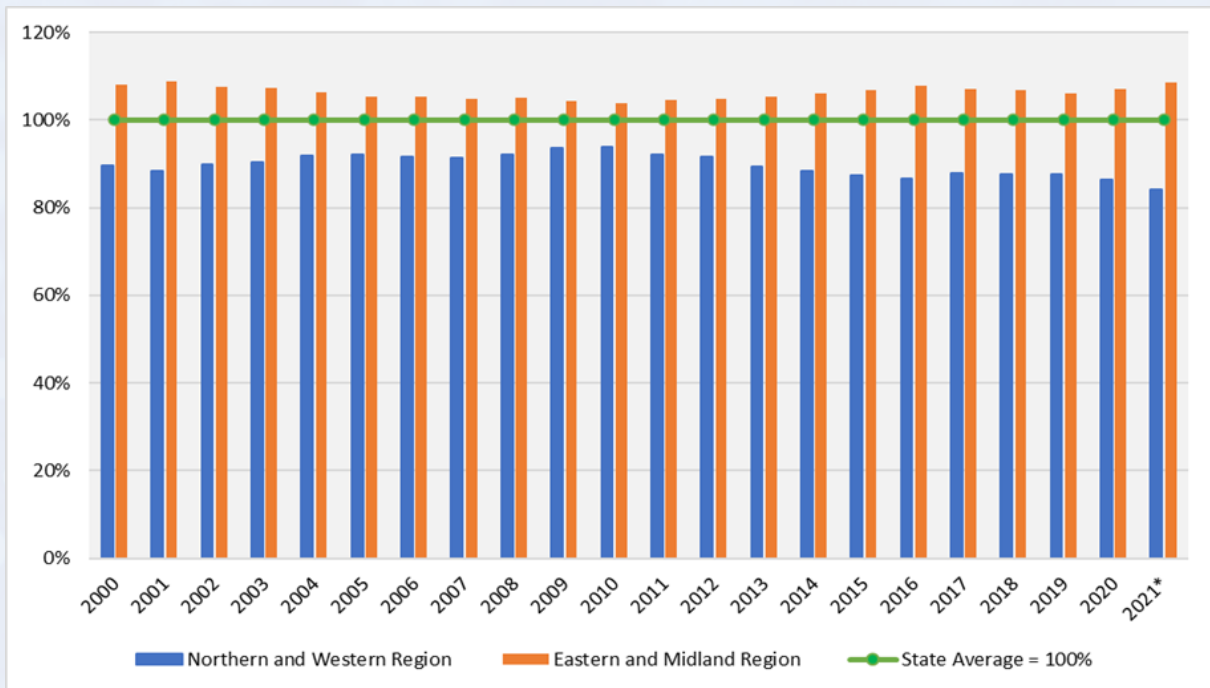
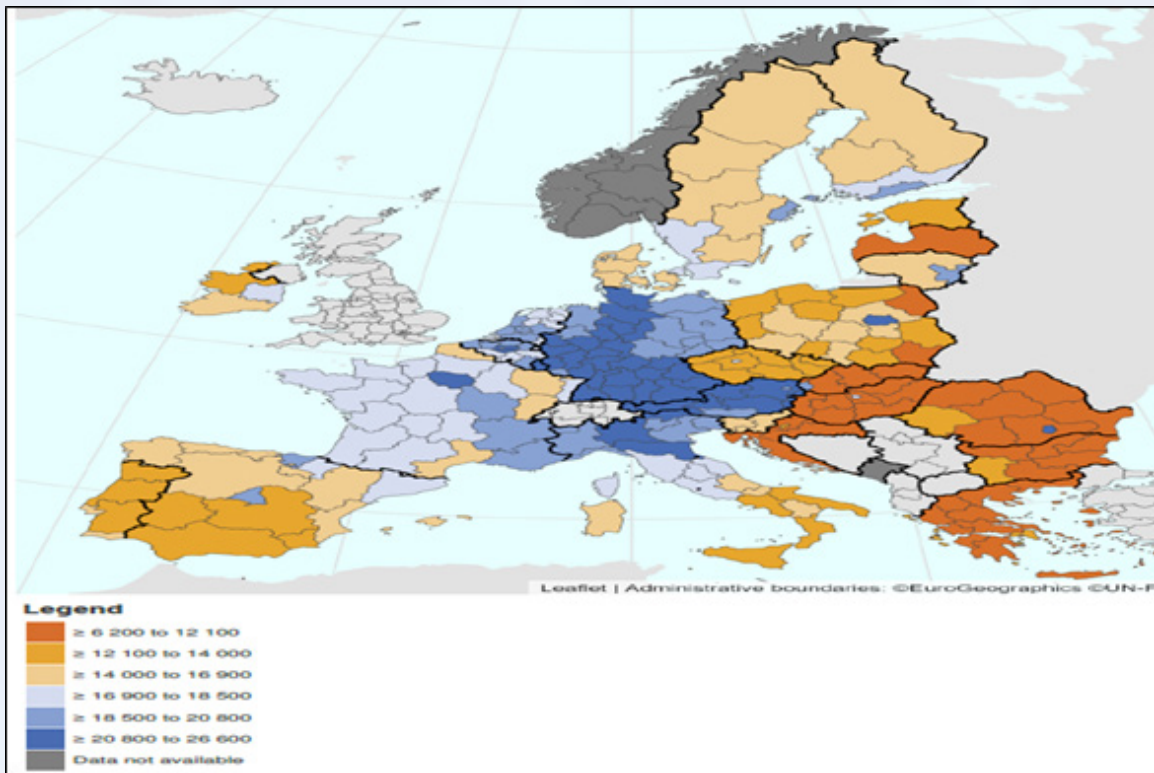


Figure 2: Disposable income per head of population in the Northern and Western Region and the Eastern and Midland Region – as a percentage of the State average – 2000-2021*



Source: CSO. *2021 is an estimate from the CSO

Figure 3: Average disposable income per head of population, by the NUTS 2 Regions of the EU27, Purchasing Power Standard (PPS), 2020



Source: Eurostat

2.3: Regional Infrastructure Deficits

Data from the European Commission’s “Regional Competitiveness Index” 2022¹⁸ found that infrastructure deficits in the Northern and Western Region and the Southern Region of Ireland seem to be undermining the competitiveness of the Irish economy to attract further investment, jobs and talent. Specifically, the index measures the competitiveness of the NUTS 2 Regions of the EU27, evaluating their performance in areas such as – but not limited to – infrastructure, innovation capabilities, technologies readiness, education and labour market conditions.

The overall score of each NUTS 2 Region – and their subsequent performance with respect to each indicator – is measured relative to the EU27 average which has been set at an index score of 100. Of the 3 NUTS 2 Regions of Ireland, the Northern and Western Region was the only region in Ireland that was below the EU27 average in terms of competitiveness, with an overall index score of 98.2, with above average index scores registered in the Southern Region (105.1) and the Eastern and Midland Region (121.7). Out of the 234 regions in the EU27, the Eastern and Midland Region was ranked as the 24th most competitive regional economy, with the Southern Region ranked 94th and the Northern and Western Region ranked 114th. Of the 234 EU regions examined, the Province of Utrecht in the Netherlands was the EU’s most competitive region, followed by another Dutch region – namely Zuid- Holland – and Île-de-France, which is the region of Paris.

Table 1: Scores of the overall “Regional Competitiveness Index” and “Infrastructure Sub-Index*”, for the three NUTS 2 Regions of Ireland vs the State average, 2022

	Overall Regional Competitiveness Index Score (EU27 = 100)	Infrastructure Sub-Index Score (EU27 = 100)
Northern and Western Region	98.2	34.1
Southern Region	105.1	50.7
Eastern and Midland Region	121.7	115.2
Ireland	112.0	79.5

Source: European Commission.¹⁹ **“Infrastructure Index” is a sub component of the overall “Regional Competitiveness Index”.

Notably, the index goes further than simply providing an overall score and actually identifies the specific strengths and weaknesses of the economy of each EU Member State and its regions, showing policymakers where their respective country or region has to make improvements or can make further progress. At a national level, Ireland – relative to the EU27 average – was found to be relatively strong in a wide range of areas key to attracting investment, jobs and talent, with above average performances evident in innovation capabilities, business sophistication, technological readiness, labour market conditions, higher education and lifelong learning, basic education, health of its citizens, macroeconomic conditions and institutions. That said, where Ireland notably underperforms and records relatively weak scores is in the area of “Market Size” but predominantly in the area of “Infrastructure”, with notably poor performances in the Northern and Western Region and the Southern Region of Ireland credited to these scores. Overall, Ireland was ranked the 9th most competitive economy in the EU27, with the Netherlands classified as the most competitive economy.

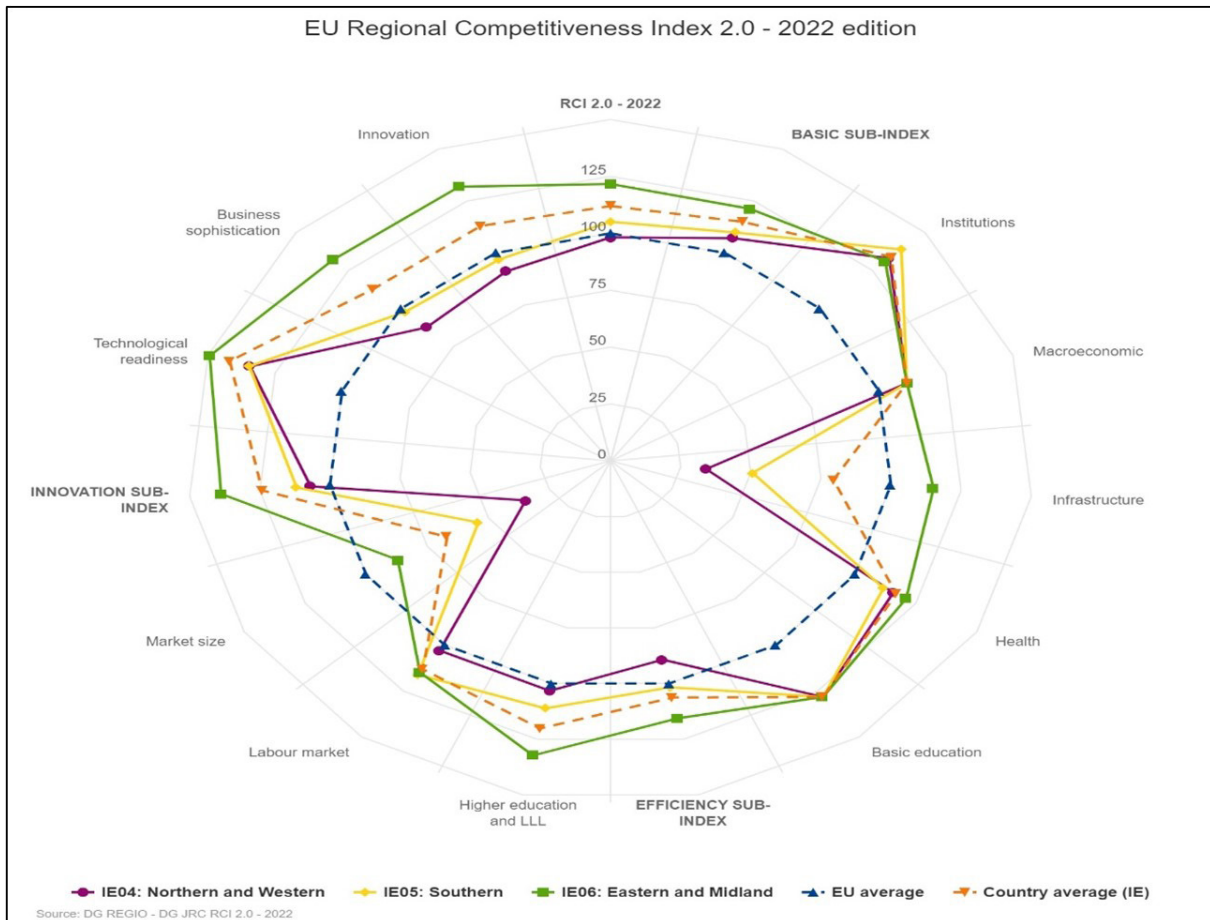
In terms of infrastructure, the Eastern and Midland Region recorded an above average index score of 115.2, whereas Ireland’s most rural region under Project Ireland 2040 – namely the Northern and Western Region – recorded an infrastructure index score of only 34.1 while the Southern Region also recorded a below average score of 50.7. Similar regional differences were found with respect to market size capabilities. The score for the Eastern and Midland Region is reflective of the trend across the EU, whereby “Capital City” regions are the most competitive in all Member States except Germany, Italy, and the Netherlands. The more competitive countries tend to have a smaller gap between their “Capital City” region and the other regions. The promotion of upward convergence is critical in helping those less competitive regions to improve their performance and ensure that the most competitive regions continue to thrive.

¹⁸ https://ec.europa.eu/regional_policy/assets/regional-competitiveness/index.html#/

¹⁹ https://ec.europa.eu/regional_policy/assets/regional-competitiveness/index.html#/IE/IE04

Therefore, if policymakers are to improve the competitiveness of the Irish economy, then it is clear that the ambition, quality and scale of infrastructure projects delivered to the Northern and Western Region will have to be significantly upgraded. This also underlines the importance of delivering an integrated sustainable development approach to the prioritization and delivery of large scale infrastructure projects necessary to harness the potential of our regional assets, particularly at our sea ports of regional scale such as the Port of Galway, Killybegs and Ros an Mhíl.

Figure 4: Index scores of the NUTS 2 Regions of Ireland in the European Commission’s 2022 “Regional Competitiveness Index”, (Blue line = EU27 average)



Source: European Commission’s Regional Competitiveness Index



2.4: Offshore Wind Energy Potential

The Northern and Western Region has an abundance of infrastructure assets that will play a key role in supporting the development of the offshore wind energy sector in Ireland, as evident from the availability of ports that possess the potential to either act as staging ports during construction of offshore wind energy projects or to serve as operational and maintenance bases. These key ports include the Port of Galway, Killybegs Harbour and Ros an Mhíl.

- ◇ **Killybegs Harbour:** According to a Wind Energy Ireland report,²⁰ Killybegs Harbour – in its current form – would have difficulties in serving as a manufacturing and staging port for potential offshore wind projects, both in terms of fixed and floating wind turbines. However, with targeted investment and utilising existing attributes – such as the natural deep water in proximity to the quay, relatively significant quay lengths and a skilled labour force – Wind Energy Ireland believes that Killybegs has strong potential for serving the offshore wind energy sector, particularly floating wind turbine project requirements along with the coast of the Northern and Western Region of Ireland.

Research undertaken by the Carbon Trust²¹ also found that Killybegs would be capable of operational and maintenance services without any significant investment or strategic change to meet requirements of the offshore wind energy sector, while the research notes that Killybegs is capable of developing a potential cluster provided significant investment and a change in strategic direction is undertaken to meet the requirements of the sector. On this basis, the Northern and Western Regional Assembly believes that the harbour of Killybegs is uniquely positioned to support the development of Ireland's offshore wind energy sector in the coming years, and with further investment in its infrastructure – through the review of the National Ports Policy – additional opportunities can be delivered for the region.

- ◇ **Port of Galway:** The Carbon Trust's research notes that the Port of Galway is currently capable of operational and maintenance services for offshore wind energy projects, without any significant investment or strategic change, while the research notes that port is capable of staging and manufacturing activities provided significant investment and a change in strategic direction is undertaken to meet the requirements of the sector. With this in mind, it is clear that the Port of Galway has considerable potential in supporting the future growth of the offshore wind energy sector in Ireland, and with greater investment in the port – through the review of the National Ports Policy – additional opportunities can be delivered for the region.
- ◇ **Ros an Mhíl:** Ros an Mhíl's strategic location, its port depth, the approach channel depth, and the lack of land availability means this port cannot currently serve the offshore wind sector beyond operational and maintenance services, as per research carried out by the Carbon Trust.²² Nevertheless, given the strategic location of Ros an Mhíl, it is clear that the port could act as an important operational and maintenance base for offshore wind energy projects along the west coast of Ireland, depending on the level of investment provided to support the port's infrastructure.

Such potential is evident from a report from Údarás na Gaeltachta which noted that Ros an Mhíl is currently well positioned to compete as an operational and maintenance port to wind farms from Loop Head to Belmullet,²³ with the report noting that the offshore wind energy sector has notable potential in supporting economic activity and employment in Galway and the wider region. On this basis, the Northern and Western Regional Assembly feels that Ros an Mhíl can make a significant contribution in supporting the future development of Ireland's offshore wind energy sector, and with further investment in its infrastructure – through the review of the National Ports Policy – it is clear that significant economic benefits can be delivered for the Northern and Western Region of Ireland.

- ◇ **Other Ports:** Greencastle, Sligo Port and a number of other small scale ports located across the coast of the Northern and Western Region of Ireland, may offer more limited opportunities to support the offshore wind energy sector. These locations could benefit from appropriate feasibility studies and infrastructure upgrades to enable them to offer support to offshore wind energy projects.

²⁰ <https://windenergyireland.com/images/files/final-national-ports-study.pdf>

²¹ <https://windenergyireland.com/images/files/final-harnessing-our-potential-report-may-2020.pdf>

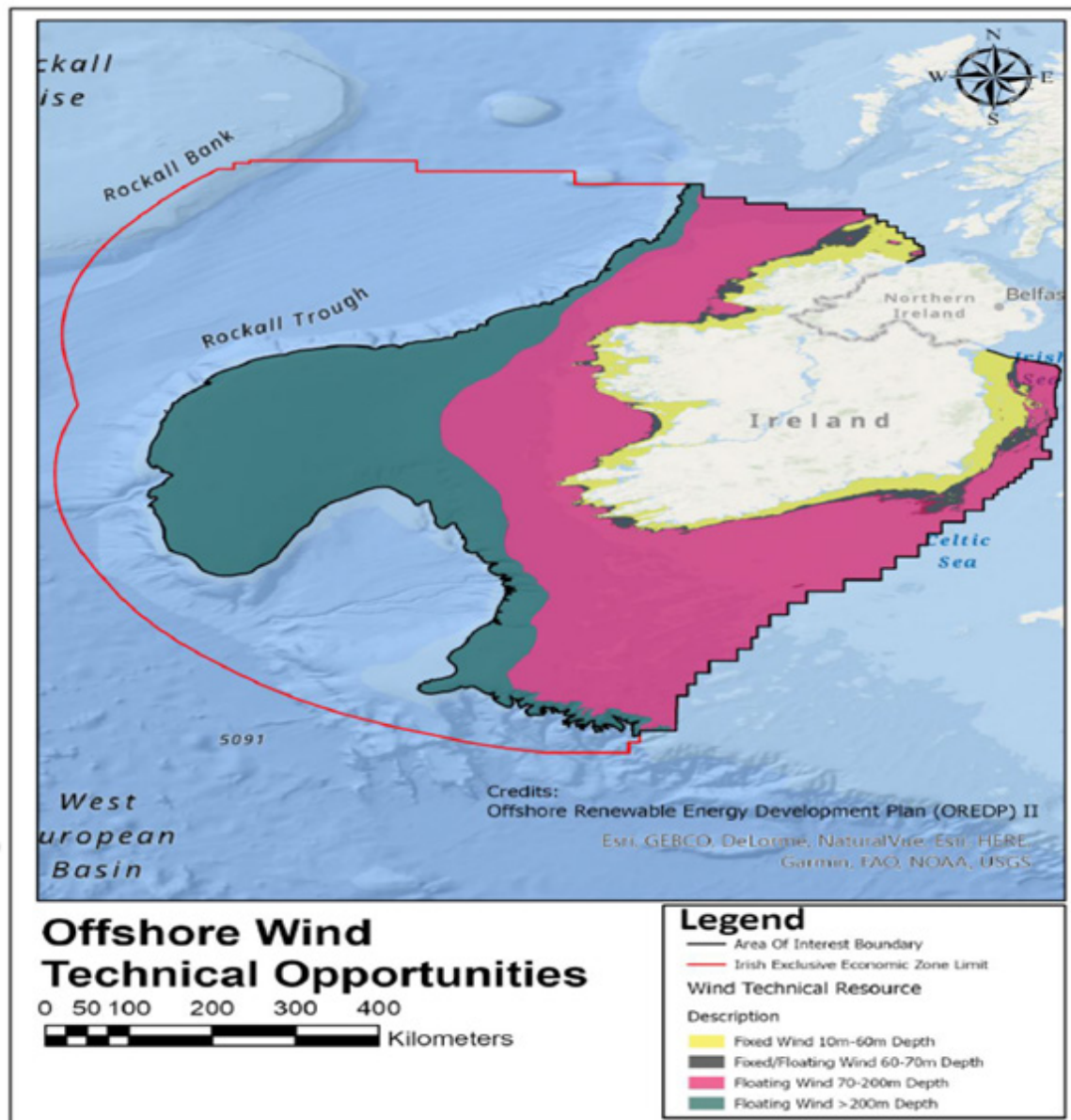
²² <https://windenergyireland.com/images/files/final-harnessing-our-potential-report-may-2020.pdf>

²³ <https://udas.ie/assets/uploads/2021/10/Ros-a-Mhil-A-Strategic-Hub-Executive-Summary.pdf>

Furthermore, the Northern and Western Region of Ireland is also considered a prime location for investment opportunities for offshore wind energy projects, due to an abundance of natural assets in the region, with these natural characteristics likely to aid any future investments in the ports of the region. These would include – but would not be limited to – the fact the Northern and Western Region has some of the fastest average wind speeds in Europe and appropriate water depths for fixed and floating wind turbine projects. This potential is evident from Figure 5, which shows the scale of offshore wind energy opportunities off the coast of the Northern and Western Region of Ireland – both in terms of fixed and floating wind energy – with this potential highlighted in the latest draft of Offshore Renewable Energy Development Plan (OREDP II).

According to the latest draft of the development plan,²⁴ a sizable area of Ireland’s maritime area is suitable for a range of fixed and floating wind turbine projects, with such potential based on water depth or bathymetry and wind speed. The review of the National Ports Policy has an important role in ensuring that these natural assets and characteristics can be utilised to support future economic and employment opportunities for the ports located along the coast of the Northern and Western Region of Ireland.

Figure 5: Offshore wind energy opportunities for Ireland’s maritime area out to the outer limit of the “Exclusive Economic Zone” (EEZ)



Source: Draft Offshore Renewable Energy Development Plan (OREDP II)

²⁴ Offshore Renewable Energy Development Plan (OREDP II).

2.5: Regional Imbalance in Port Activity

The total tonnage of goods being handled by Dublin Port – as a percentage of the total tonnage of goods handled in Ireland – has progressively increased since the early to mid-2000s, as economic activity has become more concentrated in the wider Eastern and Midland Region of Ireland. As evident from Figure 6, Dublin Port accounted between 35 and 39 per cent of the total tonnage of goods handled in Ireland in the early to mid-2000s, with the port’s share of the total tonnages of good handled in Ireland progressively rising to 48.2 per cent as of 2022.²⁵

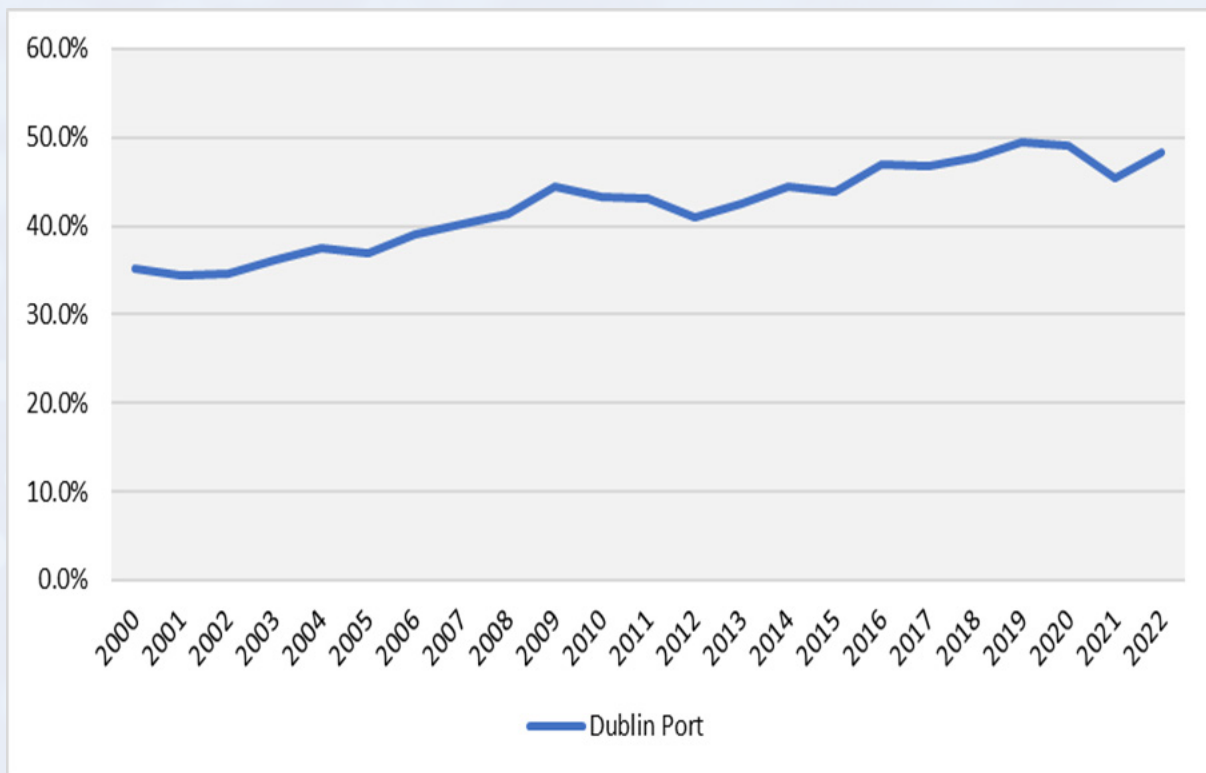
In contrast, the Port of Galway’s share of the total tonnage of goods handled in Ireland has progressively fallen over the past two decades, dropping from a high of 2 per cent in 2005 to 0.5 per cent in 2022, as evident from Figure 7. Throughout this period of time, Killybegs Harbour and Sligo Port accounted for less than 0.5 per cent of the total tonnage of goods handled in Ireland. Notwithstanding the impact of Brexit and other practical matters related to the transportation of certain goods, it is clear that the continuation of these trends may lead to capacity issues for Dublin Port going forward – with future capacity issues regarding Lift-on/lift-off traffic raised in the 2023 Irish Ports Capacity Review²⁶ – while such trends seem to be contrary to the vision and objectives of the NPF and the RSEs, which seek to support the delivery of balanced regional development in Ireland. Such trends and issues highlight the possibility of supporting ports in the Northern and Western Region of Ireland as a means of addressing potential capacity issues in Dublin Port in the future, while also addressing historical regional imbalances in Ireland.

²⁵ <https://data.cso.ie/table/TBA07>

²⁶ <https://www.gov.ie/en/consultation/a4e49-public-consultation-for-review-of-national-ports-policy/>

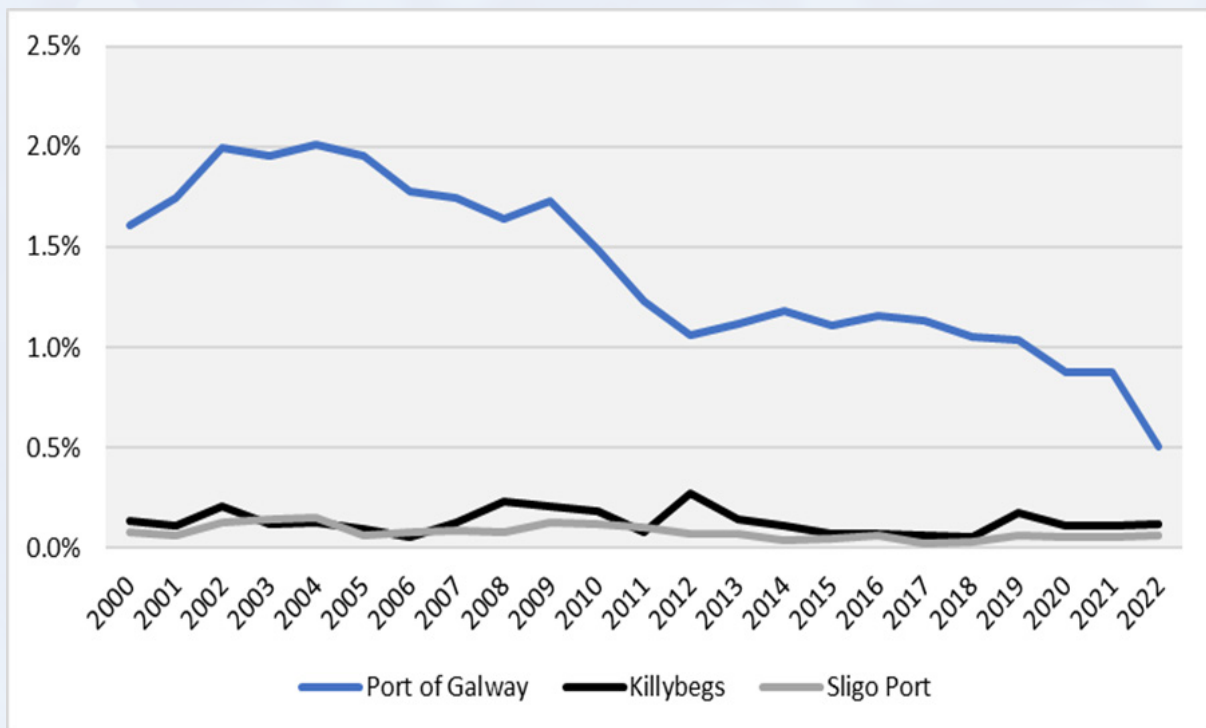


Figure 6: Total tonnage of good handled in Dublin Port, as a percentage of the total tonnage of goods handled in Ireland, 2000-2022



Source: CSO

Figure 7: Total tonnage of good handled in the ports of the Northern and Western Region of Ireland, as a percentage of the total tonnage of goods handled in Ireland, 2000-2022



Source: CSO

Amongst other things, the review of the National Ports Policy has the potential to reduce rising regional disparities in Ireland, thereby supporting the delivery of balanced regional development in line with the vision and objectives of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) of the Northern and Western Region of Ireland:

Such a review provides an opportunity to strategically position and support the ports of the Northern and Western Region of Ireland to capitalise on various future opportunities, ranging from international trade, offshore and onshore wind energy, the blue economy and the cruise industry. Within this context – and having considered the relevant consultation questions²⁷ in the Department’s issues paper – the Northern and Western Regional Assembly has made a series of recommendations to be considered in the review of the National Ports Policy, namely:

- 1. Develop a “Regional Ports Programme” to allow exchequer funding to be used to support the development of “Ports of Regional Significance” and other ports located along the coast of the Northern and Western Region of Ireland, with a particular focus on developing the region’s offshore and onshore renewable energy sector, trading sector, cruise tourism and the blue economy.** Similar to the Regional Airports Programme, the review of the National Ports Policy should aim to develop and implement a “Regional Ports Programme” which would provide regular exchequer funding to “Ports of Regional Significance” and other ports in the Northern and Western Region of Ireland, with a particular focus on the Port of Galway, Killybegs and Ros An Mhíl, along with other ports such as Sligo and Greencastle. In line with the Regional Airports Programme – which distributes funding based on airport passenger numbers per annum – the distribution of this funding should be based on annual performance metrics such as – but not limited to – the tonnage of goods handled, the number of passengers handled, level of fish landings, the level of Megawatts (MWs) supported from the handling of onshore and offshore wind energy components and appropriate environmental indicators such as local marine resources and carbon emissions associated with the port.

Such funding should focus on supporting activities related to the offshore and onshore wind energy sector, trading sector, cruise tourism and the blue economy, allowing ports in the region to support their traditional business activities while also capitalising on new opportunities in emerging markets. For example, as noted in the Department’s issues paper, potential capacity issues have been highlighted at Dublin Port regarding cruise ships, with the paper stating that “Post Brexit there has been a huge increase in the volume of goods going to continental Europe and a large proportion of the ships carrying these goods are calling onto the berths previously made available for cruise ships. As a result, the company²⁸ has scaled back the number of cruise ship bookings it can accept with many now anchoring in Dublin Bay and being tendered to Dún Laoghaire.” As a means of supporting balanced regional development and diversifying the activities of our region’s ports, the review of the National Ports Policy – through a “Regional Ports Programme” – should examine how the growing market of cruise tourism can be directed towards more “Regional Ports of Significance” and other ports in the Northern and Western Region. Furthermore, the uptake of exchequer funding from any potential “Regional Ports Programme” by ports in the Northern and Western Region of Ireland should not preclude them from applying for separate funding opportunities from any potential national funding programmes.

²⁷ <https://www.gov.ie/en/consultation/a4e49-public-consultation-for-review-of-national-ports-policy/>

²⁸ “Dublin Port” is the company in question.

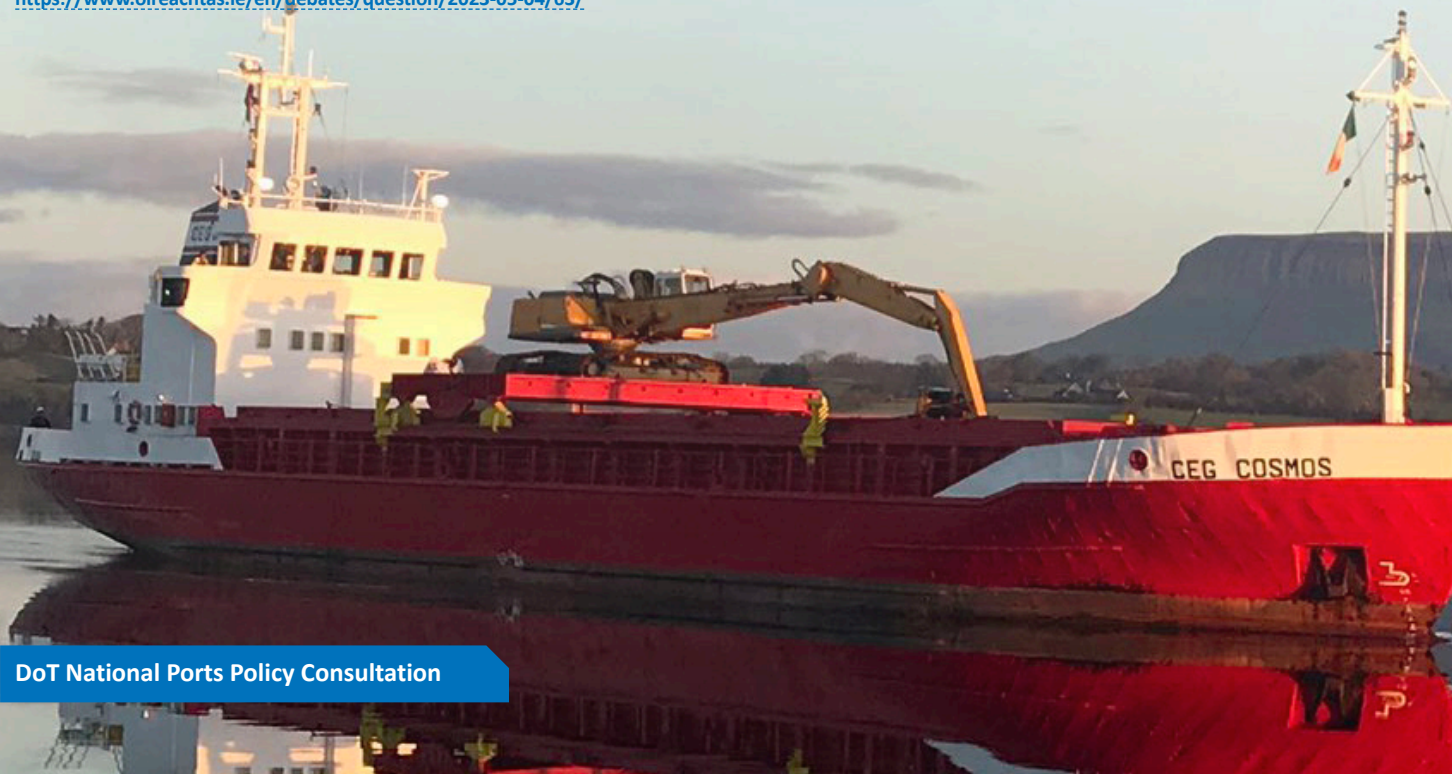
2. **Designate the fishery ports located in the Northern and Western Region of Ireland with a multi-purpose designation.** To capitalise on emerging opportunities in areas such as – but not limited to – cruise tourism, the blue economy and the onshore and offshore wind energy sector, the review of the National Ports Policy should designate fishery ports in the region with a multi-purpose designation, reflecting their important roles in supporting the region’s economy. Such a designation would allow these ports to focus not only on their traditional business activities related to the fishing sector, but also allow them to further develop policies, services and infrastructure which will develop opportunities in emerging growth areas outside of the fisheries sector.
3. **Prioritize the development of strategic infrastructure projects in Killybegs Harbour, Port of Galway and Ross an Mhíl that will support the development of the offshore and onshore renewable energy sector, thereby supporting “Regional Policy Objective” (RPO) 4.33 of the RSES of the Northern and Western Region of Ireland.** The Northern and Western Region of Ireland has an abundance of infrastructure assets that will play a key role in supporting the development of the offshore and onshore wind energy sector in Ireland, as evident from the availability of ports that possess the potential to either act as staging ports during construction of offshore wind energy projects or to serve as operational and maintenance bases. As noted in Sub-Section 2.4 of this submission, several reports have highlighted how Killybegs Harbour, Port of Galway and Ross an Mhíl – with appropriate levels of investment and strategic direction – have the potential to capitalise on the opportunities associated with the emerging offshore wind energy sector. The review of the National Ports Policy should acknowledge these potential opportunities and prioritize the development of these infrastructure assets.
4. **Support the development of strategic infrastructure projects in all ports in the Northern and Western Region of Ireland that will improve climate resilience, support environmental sustainability, reduce the associated carbon footprint of these ports and prepare the ports for the transition to a low carbon economy.** Unless significant progress is made in reducing carbon emissions globally, the impact of climate change on our region’s ports will be significant, with rising sea tides, more frequent storms and other extreme weather events likely to cause significant damage and disruption to the infrastructure and operations of our ports, while also affecting surrounding environmental assets and marine resources. Furthermore, as Ireland – and our international trading partners – transition towards a low carbon economy, the subsequent changes will also impact the composition and level of cargo flowing through Irish ports, with the importation of products such as oil and other fuel products connected to fossil fuels likely to decline in the coming years. On this basis – and given the well-established challenge of funding for ports – it is clear that the review of the National Ports Policy needs to address these challenges by developing and implementing a “Regional Ports Programme” which provides exchequer funding to ports to prepare and overcome these challenges. In doing so, the review of the National Ports Policy will improve port’s climate resilience, support environmental sustainability, reduce the associated carbon footprint of these ports and prepare the ports for the transition to a low carbon economy.
5. **Allow “Ports of Regional Significance” and other ports located along the coast of the Northern and Western Region of Ireland to apply for funding under the European Regional Development Fund (ERDF) for the next EU funding period of 2028-2035.** In November 2022, Ireland’s two ERDF Programmes for the period 2021 to 2027 were launched, with these programmes aiming to invest €853 million in projects which will support regional development in Ireland. Of the funding, just over €200 million will be invested in the Northern and Western Region of Ireland – through the Northern and Western Regional Programme – with the Northern and Western Regional Assembly acting as the Managing Authorities of this funding allocation in the region.

Although the funding allocations for the 2021 to 2027 period have been agreed to, the review of the National Ports Policy should allow “Ports of Regional Significance” and other ports located along the coast of the Northern and Western Region of Ireland to be eligible for funding allocations under the ERDF for the next funding period of 2028 to 2035. Considering the role of “Ports of Regional Significance” and other ports in supporting regional development and Ireland’s transition to a low carbon economy, the distribution of this type of funding would be strongly aligned to “PO 2: A Greener Europe” and the overall remit of the ERDF, namely reducing disparities between the levels of development of European regions and to improving living standards in the least-favoured regions.²⁹

²⁹ <https://www.europarl.europa.eu/factsheets/en/sheet/95/european-regional-development-fund-erdf>.

6. **Provide exchequer funding to ports to resource EU project officers, as a means of improving their bidding capacity in applying for funds under the EU’s Connecting Europe Facility and other appropriate EU funding programmes.** Ports on the Trans European Network for Transport Network (TEN-T)³⁰ are eligible to apply for Connecting Europe Facility (CEF) funding towards their infrastructure developments, with the potential for up to 50 per cent of eligible costs for studies and up to 30 per cent of infrastructure works costs. In order to support the bidding capacity of ports in applying for EU funding, any potential “Regional Ports Programme” should provide exchequer funding to ports so they can employ EU project officers to support funding applications for EU funding programmes such as the CEF.
7. **Mandate the Ireland Strategic Investment Fund (ISIF) to invest in strategic infrastructure projects in all ports located along the coast of the Northern and Western Region of Ireland, with a particular focus on developing the region’s offshore and onshore renewable energy sector, cruise tourism and the blue economy.** The ISIF – which is managed and controlled by the National Treasury Management Agency (NTMA) – is a Irish sovereign development fund with a mandate to invest on a commercial basis to support economic activity and employment in Ireland. In this regard, ISIF has made investments across many sectors and regions, with a particular focus on projects related to climate change. Given the unique position of ports located along the coast of the region in developing investment opportunities in the offshore renewable energy sector, cruise tourism and the blue economy, it is clear that the government should mandate ISIF to invest in strategic investment projects in ports such as the Port of Galway, Killybegs Harbour and Ros an Mhíl, as a means of supporting Ireland’s transition to a low carbon society, while also supporting the delivery of balanced regional development in Ireland.
8. **Explore how the ports located on the coast of the Northern and Western Region of Ireland can capitalise on the potential opportunities related to the development of the hydrogen economy.** The hydrogen economy is expected to make a significant contribution to Ireland’s transition to a low carbon economy, offering a zero-emission source of dispatchable flexible electricity, as a long duration store of renewable energy and as a transport fuel in sectors such as heavy goods transport, aviation and maritime. The review of the National Ports Policy should explore how ports located along the coast of the Northern and Western Region of Ireland can capitalise on the potential opportunities related to the development of the hydrogen economy.
9. **Strategic port projects in the Northern and Western Region of Ireland – which are proven to be of high value to society – should be considered for exchequer and EU funding.** The review of the National Ports Policy should allow ports located along the coast of the Northern and Western Region of Ireland to apply for exchequer and EU funding for projects that are proven to be of high value to society. In this regard, this would include projects that will:
 - ◊ Support balanced regional development, in line with the vision and objectives of the NPF and the RSES of the Northern and Western Region
 - ◊ Support the targets of the Climate Action Plan, particularly regarding the delivery of 9 GW of onshore wind and at least 5 GW of offshore wind by 2030.

³⁰ <https://www.oireachtas.ie/en/debates/question/2023-05-04/63/>




- 10. Prioritize the proposed relocation and expansion of the Port of Galway, thereby supporting RPO 4.36 of the RSES of the Northern and Western Region of Ireland.** Given the significant benefits of the proposed relocation and expansion of the Port of Galway – from a regional development, climate and urban regeneration perspective – it is imperative that the review of the National Ports Policy explicitly aims to swiftly deliver this proposed development. Such a development provides ample opportunities to improve cruise ship activity, international trade, recreational and marine leisure activities while improving the capabilities of the port in facilitating offshore and onshore wind energy projects off the coast of the region. Furthermore, the proposed Inner Dockland project will enable the development of residential, commercial, retail and cultural buildings in the centre of Galway City, thereby supporting the population and compact growth targets of the RSES. For these reasons, it is imperative that the review of the National Ports Policy aims to prioritise the proposed project’s swift delivery, allowing the relocation and expansion of the Port of Galway.
- 11. Examine the potential of the Northern and Western Region’s other main ports to expand and enhance facilities to enable them to become ports with enhanced regional significance in a range of areas, including trade, fisheries, marine tourism and renewables, thereby supporting the delivery of RPO 4.37 of the RSES of the Northern and Western Region of Ireland.** The review of the National Ports Policy should commit to examining the overall potential of other key ports in the region – namely ports outside of our “Ports of Regional Significance” – and this should be done in conjunction with all relevant stakeholders, including the relevant Local Authorities and the Northern and Western Regional Assembly.
- 12. Support the development of data driven technology, sensors and the IoT in the ports of the Northern and Western Region of Ireland, allowing them to become “Smart Ports” in line with RPO 6.4 of the RSES of the Northern and Western Region of Ireland.** Ports across Europe are introducing data driven technology, sensors and the IoT in a shift to becoming “Smart Ports”. To remain competitive and efficient, it is important that our ports look to adopt new technologies in the transition towards becoming “Smart Ports”. In this regard, “Smart Ports” provide opportunities for port authorities to reduce costs, operate more efficiently and maximise resources and space. “Smart Ports” can help automate processes and provide solutions to many of the challenges that ports face such as compliance, growth in size, traffic and Brexit.
- 13. The performance of ports should be examined on a wide range of economic and environmental metrics.** To reflect the changing nature and functions of ports, the review of the National Ports Policy should embrace new economic and environmental indicators in monitoring the performance of ports going forward. Historically, the degree to which a port was or wasn’t performing has been evaluated through the tonnage of goods handled through the port in a given year. While this indicator provides an indication of the performance of the port in a given year, it fails to fully account for the degree to which a port contributes to the performance of regional economies through other activities such as cruise tourism, the blue economy, environmental standards, the onshore wind energy sector and the emerging offshore wind energy sector. Therefore, the review of the National Ports Policy should commit to adopting annual performance metrics in areas such as – but not limited to – the number of cruise passengers handled, level of fish landings, the level of Megawatts (MWs) supported from the handling of onshore and offshore wind energy components and appropriate environmental indicators such as local marine resources and carbon emissions associated with the port.



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