



GOOD ENERGIES ALLIANCE
IRELAND

Public Consultation on
REGIONAL SPATIAL AND ECONOMIC STRATEGY

Submission to the Northern & Western Regional Assembly

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Introduction

Good Energies Alliance Ireland (GEAI) is a non-profit Environmental NGO in Ireland with a principal focus on energy sources and uses. GEAI is based in Leitrim but its remit is all-island. Its mission is through research, advocacy, education and campaigning to influence public opinion and decision-makers in Ireland against the continued use of fossil fuels and towards practical policies on energy sources and uses that combat climate change and respect the environment, the planet and people. GEAI is a member of the Environmental Pillar and Stop Climate Chaos.

GEAI welcomes the opportunity to contribute to the regional debate through this public consultation by emphasising energy and climate related issues, crucial to the Northern and Western Region.

Extreme events such as storm and floods have always been some of the recurring features of Ireland's climate. No doubts remain that these events are driven by a changing climate and that we are experiencing and witnessing an increased magnitude in their severity as Hurricane Ophelia has shown. The Government has begun a statutory process to adapt the country to future climate change impacts by publishing the final version of the National Adaptation Framework to Climate Change (January 2018) along with a National Mitigation Plan (July 2017).

Ireland is third highest emitter per capita of CO₂ in the EU and its carbon emissions are currently rising instead of falling as the Irish Government fails to meet the 2020 national emission reduction targets¹. At national level, even though on paper the threat posed by a changing climate is acknowledged, strong political will is still missing to support decisive climate commitments.

Similarly, the extent of the problem does not appear to be fully acknowledged by this regional strategic document. From a document analysis perspective, it emerges that the word "climate change" is mentioned very few times. Once again, Serious commitments are lacking at regional level. Climate change is real and is happening right now and every delay or reticence in adopting further policies to cope with it will result in huge economic and financial losses for the Irish economy.

Furthermore, there seems to be a lack of clear vision regarding the concept of "sustainability" throughout the whole Strategy. Despite the term sustainability being mentioned, neither indications nor goals and targets are provided on how to achieve it. How is sustainability defined in this context? How is it going to be achieved?

¹ <https://www.irishtimes.com/news/ireland/irish-news/ireland-will-miss-climate-targets-by-more-than-expected-1.3280630>

The Regional Spatial and Economic Strategy provides a valuable tool to boost regional economic and social development. This submission seeks therefore to support the Northern and Western Regional Assembly in the implementation process by pointing out some considerations for further reflection.

How can rural towns and villages best be revitalised within the Region?

Rural towns and villages can be revitalised by increasing employment opportunities and providing economic, social and environmental conditions in order to offer attractive benefits, which will result in an increased population. This is in line with the National Planning Framework, which illustrates projections to accommodate a population increase of 150,000-175,000 people up to 2040 in the NWR. This will require the creation of additional 110,000 new jobs, and a total of 450,000 jobs within the Region.

In our vision, rural communities must be positioned at the heart of Ireland's regional development strategy. Active rural communities can only be supported by a vibrant economy through the creation of new jobs while tackling the issue of a changing climate. Accordingly, the National Planning Framework states that *"supporting the diversification of the rural economy is essential not just to create job opportunities in rural areas but is also an opportunity to link employment to bigger issues such as climate change, managing sustainable land use and sustaining vibrant rural communities."*

This also shows that, if we want to ensure a sustainable development of the region, our energy needs have to be set as a priority issue.

With this vision in mind, GEAI strongly supports the notion of **community energy ownership**.

The National Planning Framework pinpoints how *"rural areas have a strong role to play in securing a sustainable renewable energy supply for the country. Historically, rural areas have significantly contributed to the energy needs of the country and continue to do so. In planning Ireland's future energy landscape and in transitioning to a low carbon economy, the ability to diversify and adapt to new energy technologies is essential. Innovative and novel solutions for renewables have been delivered in rural areas over the last number of years, particularly in the areas of solar, wind and bio mass."* It continues highlighting that *"in meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment."*²

² <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF-PRINT.pdf>

According to the National Planning Framework, it is evident that rural communities have a vital part to play in the country's transition toward a low carbon economy.

In the GEAI "Powerful Communities" project, a scenario is envisaged where every household, farm or small business and community is supported to generate electricity for personal consumption and sell the surplus generated back to the national grid. This would achieve a twofold goal: contributing to Ireland's energy security and keeping the benefits deriving from electricity production within communities that generate it while boosting the local and regional economy. This project will be officially launched in May 2018.

GEAI has a vision of the Region becoming a self-sustaining macro-generator of electricity, producing a significant proportion of the nation's total need for power. We therefore agree with the RSES strategy of supporting the ambition for this region to become a net exporter of energy.

An essential part of the Powerful Communities project is Government support of micro-scale electricity generation (micro-generation hereinafter). In particular, it is vital that Government initiates immediately a scheme for fair feed-in tariffs for all electricity generation from 50 watts to 6 megawatts. Thus, individuals, businesses and communities could plan the implementation of community energy, whether wind, solar or biofuel generation.

A micro-generation support scheme would:

- engage householders and farmer's attention;
- introduce them to the possibility of change in their sources and uses of energy; and
- make them more amenable to consider new ways of doing things.

In particular, if the individual feels that he/she is being supported to participate in the new world of renewables, this will make them far more amenable to support proposals for larger-scale developments such as wind farms.

It is not enough to plan big projects and only then to try to engage the local community. If Ireland is indeed to achieve a fully decarbonised power sector by 2050, then every house, every business, every farm must have the opportunity to participate in this transformation.

Micro-generation must form part of this transformation – it is easily the best way to engage local communities and individuals who at present know very little about renewable energy and don't care. Residential Solar PV may not seem to be economically viable according to the recently

published national RESS consultation but the impact of good will that can be generated by a micro-generation scheme is not to be under-estimated. If every house can reduce its electricity bill; if every farm can develop a new income stream from small wind farms, if solar PV becomes “fashionable” and people become enthusiastic, the knock-on effect will be the support of bigger projects and appreciation of the benefits accruing despite their impact on nearby landscapes.

The switch to renewables requires buy-in to the vision of change by all sectors of the community – householders, small businesses, farmers, disadvantaged as well as prosperous.

What do you believe to be the potential disrupters in our regional/ national economy and what strategy will be necessary as a consequence?

It is truly appalling that climate change is not mentioned among the disrupters in the document along with Brexit and the so-called 4th Industrial Revolution, associated with tremendous technological development.

Climate change is undoubtedly one of the biggest challenges of our century. It is not acceptable that a regional strategy does not even begin to consider the issue, thereby not grasping the range of potential economic opportunities that this threat also brings along. Just to mention one opportunity, the transition towards a low carbon economy, the only feasible step to cope with a changing climate, entails a significant boost in jobs creation which is crucial for our Region. Thousands of jobs can be generated in the field of renewable energies through installation and maintenance of wind turbines and solar PVs, amongst others.

How do we integrate sustainable policy and practice into our RSES so that they add value and not just regulate our practices?

Integration of policies and practices into the RSES can be achieved by setting out clear targets and goals which effectively take into account the value of rural communities in the transition to a low carbon economy.

The Strategy states that *“the transition [to a low carbon economy] will require a cultural step change in the approach to Green Energy Development and provides an opportunity to create sustainable communities by the region also becoming a net exporter of Green Energy”*. Undertaking a cultural change is not an easy and immediate action to be accomplished, meaning that a lot will need to be done on awareness raising. This RSES should strongly consider to adopt a Climate Change & Renewable Energy Awareness Programme if the goal is to boost a

behavioural change. This is the reason why a comprehensive stakeholder engagement process is a necessary step in order to come up with key action points, better tailored to the needs of rural communities within the region.

Would the development of a co-ordinated approach to supply chain development in the forestry/biomass sectors have the potential to deliver regionally significant dividend to the region through innovative renewable energy solutions for businesses and communities, together with the adoption of energy efficiency technology?

It is unquestionable that the forestry sector plays a vital role for the local and regional economy. The Government has been incentivising afforestation in many areas of the North and Western region through its Forestry Programme and Policy as, besides being a crucial income-generating sector, forestry is seen as an essential component to meet Ireland's carbon sequestration targets³.

Nonetheless, it is evident that the way this sector is currently managed does not go in the direction of sustainable development. Big concerns on over-intensification of tree plantation are arising in this Region as shown by several public meetings held in Counties Mayo, Sligo, Leitrim, Roscommon and Cavan on this topic. One of the main concerns, for instance, is the amount of forest growth which seems to be directly contributing to depopulation, and impacting on people's mental health⁴.

Furthermore, indiscriminate forest plantation leads not only to the disruption of the natural environment, with no respect of the local fauna, autochthonous tree species and water bodies, but also to the loss of traditional farming practices which cannot compete with forestry-related economic incentives.

GEAI acknowledges that biomass can contribute significantly to the renewable energy mix. Nevertheless, a holistic approach is strongly needed to plan for the rural areas of the North and West Region. Land must be regarded as an asset that has many possible values and uses – farming, renewable energies generation, forestry, tourism etc. Decisions made on the development of land must be based on a study of the best uses of that specific land mass. For instance, some land would be more appropriate for farming purposes rather than forestry plantation. The same applies to renewable energy installations: not all land is suited for hosting solar PVs or wind turbines.

³ <https://www.agriculture.gov.ie/media/migration/forestry/forestryprogramme2014-2020/IRELANDForestryProgramme20142020230215.pdf>

⁴ <https://www.independent.ie/business/farming/forestry-enviro/growth-of-forestry-is-impacting-on-peoples-mental-health-former-leitrim-rose-36515883.html>

This demonstrates that an overarching vision is fundamental when planning for different land uses. This approach will best accommodate different sectoral needs (e.g. energy, agriculture, households, businesses) whilst grasping opportunities a territory offers in a sustainable manner. Another key point to consider is the adaptation to technological change. Nowadays, the technology needed to shift towards a sustainable, low-carbon economy is available and it is becoming more and more widespread and economically viable. So why is there still opposition to renewable alternatives?

Part of the opposition lies within the system's failure to adapt to new changes. Legal frameworks, rules and institutions rely on an "old structure", not often flexible to perturbations. Such components of a system usually have an intrinsic characteristic of very slow adaptation to changes.

Technology, on the contrary, is evolving very fast. For technological change to be effective, it is therefore required to be fully acknowledged and embraced by the system. Regulators and planners at all levels have a key role to play in this process.

How can the RSES assist local authorities and other stakeholders in addressing its climate change responsibilities and targets?

In light of the recently published National Adaptation Framework, new regional Climate Action Offices will be established in order to coordinate the Local Authorities' response to climate change impacts at local level⁵. The Regional Spatial and Economic Strategy can provide a valuable entry point to the work of these soon-to-be established entities by informing them on the unique features, threats and opportunities of the region.

It is also necessary for all the stakeholders involved in the decision-making process to adopt an holistic approach with regard, but not limited to, the region's economic development. The North and Western Assembly is therefore in a crucial position to help regional Climate Action offices to deliver climate-proofing action plans while unlocking the region's renewable energy potential.

⁵ <https://www.dcae.gov.ie/en-ie/climate-action/publications/Documents/10/FINAL%20National%20Adaptation%20Framework-Planning%20for%20a%20Climate%20Resilient%20Ireland.pdf>

Recommendations

GEAI strongly recommends the North and Western Assembly:

1. To clarify the “sustainability” concept within the Regional Spatial and Economic Strategy
2. To take into consideration Climate Change as a serious threat but also as a big opportunity to unlock the North and Western Region’s renewable energy potential
3. To create and implement a Climate Change & Renewable Energy Awareness Programme to boost behavioural change
4. To appreciate the full potential for added value represented by rural communities in the transition towards a low carbon economy
5. To effectively engage with all other stakeholders (i.e. regional climate action offices, PPN networks, etc.) involved so that this Regional Strategy can be implemented according to a holistic approach with other policies
6. To support micro-scale electricity generation
7. To support community energy
8. To implement the rollout of community energy