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To: [DigitalConnectivity](#)
Subject: A Consultation on the State's Digital Connectivity Strategy - Western Development Commission
Date: Wednesday 30 March 2022 15:22:30
Attachments: [WDC Submission to Digital Connectivity Strategy for Ireland 2022.pdf](#)

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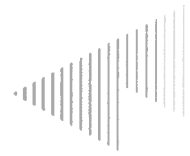
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Please find attached the WDC Submission to the Consultation on the State's Digital Connectivity Strategy 2022.

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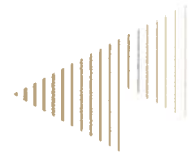
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**Western Development Commission (WDC) Response
to the Consultation on The Digital Connectivity
Strategy for Ireland 2022**



Introduction

The Western Development Commission (WDC) is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). The WDC operates under the aegis of the Department of Rural and Community Development. The WDC also has a lead role in promoting the Atlantic Economic Corridor (AEC) in the context of Project Ireland 2040¹, which extends from Donegal to Kerry. The WDC works in co-operation with national, regional and local bodies involved in western development to ensure that the Western Region maximises its full development potential.

The WDC welcomes the opportunity to submit its views to the Consultation on the Digital Connectivity Strategy for Ireland 2022. This submission sets out the views of the WDC, following the format of the Consultation paper questions. The WDC will respond to those questions where it has some expertise and insight.

The WDC regards the provision of quality broadband connectivity as essential to underpin the economic and social activity and development of the Western Region. The WDC also recognises the importance of the low carbon transition and has published a report in relation to this in 2020².

The Western Region (the seven counties under the WDC remit) is largely rural. Using the CSO definition, 64.7% of the population live outside of towns of 1,500 or more. Using the definition in [Ireland 2040 the National Planning Framework](#), 80% of people in Western Region live outside of towns of 10,000. Thus, WDC work has a particular focus on the needs of, and opportunities for, more regional and rural areas and is particularly interested in ensuring digital connectivity and digital inclusion across regional and rural Ireland.

As an overall observation, the WDC welcomes the background and context of the Draft Paper, which sets out very clearly the importance of digital connectivity in supporting more balanced regional development, supporting the green transition³ and supporting the implementation of the Government's Remote Working Strategy⁴.

Supporting balanced regional development is the basis for the work of the WDC and the WDC supports the Government's National Planning Framework and Project Ireland 2040 regional population and employment growth targets⁵. The policy objective of high-quality broadband across our region has been a key policy ask since the establishment of the WDC as it is a key enabler for economic growth and social inclusion⁶.

In addition, the WDC is the lead agency working with the Department of Rural and Community Development for the delivery of Connected Hubs.ie www.connectedhubs.ie. ConnectedHubs.ie is operated by The National Hub Network, a Government of Ireland initiative that provides a vehicle for individual hubs to come together under a shared identity to maximise the economic opportunity

¹ <http://npl.ie/project-ireland-2040-national-planning-framework/>

² <https://westerndevelopment.ie/insights/making-the-transition-to-a-low-carbon-society-in-the-western-region-2/>

³ The WDC has recently produced a report on [Transition to a Low Carbon Region](#).

⁴ The WDC has long advocated for and researched the practice of remote work in Ireland. Several WDC staff are represented on the IDG on Remote Work led by the Department of Enterprise, Trade and Employment.

⁵ More balanced regional development is the basis for the Government's National Planning Framework and Project Ireland 2040, a key goal of which is to promote greater population and employment growth in the Northern & Western and Southern Regions. <https://npl.ie/> The recently published [Our Rural Future: Rural Development Policy 2021-2025](#), highlights the importance of digital connectivity for rural areas.

⁶ [Connecting the West, Next Generation Broadband in the Western Region](#)



of remote working. The National Hub Network has the support of Government, remote working advocacy groups and industry representatives. ConnectedHubs.ie encompasses a range of features that deliver significant benefits to member hubs, hub clients, employers, local communities, and the wider economy. Launched in 2021, it is designed to simplify and standardise the process of sourcing and booking spaces, desks, offices and events in hubs for a day, a week, a month, a year or longer.

Consultation Question 1

Is the ambition level set out in the State's Digital Connectivity Strategy appropriate?

The overall targets for Digital Connectivity are set out below and the WDC provides some views on each.

1. All Irish households and businesses will be covered by a Gigabit network no later than 2028.
2. All populated areas⁴ covered by 5G by no later than 2030⁵.
3. Complete the delivery of digital connectivity to all Connected Hubs and all Schools by 2023.

Target 1: The WDC welcomes the first target, where all Irish households and businesses will be covered by a Gigabit network no later than 2028. Our understanding is that achieving this target is based on delivery of the National Broadband Plan. Therefore, the ongoing management of the timely delivery of the NBP will be very important. Delays arising from the Covid pandemic were unavoidable, but it would be important to ensure that no further delays arise during the rest of the rollout.

It is clear that there is increasing demand for fibre based connectivity; Comreg data shows 372,000 fibre subscriptions, a 50% growth over 2021⁷. The pandemic was a catalyst for more Fibre-to-the-Premises broadband connections with households recognising the need for high speeds and quality connectivity to support working from home as well as online shopping, entertainment and accessing various other services online.

While most lockdown restrictions have been removed, the trend of remote working continues to grow and Government policy supports a greater degree of remote working in support of a variety of policy objectives including improving labour market participation and reducing transport emissions. Separately, recent spikes in fuel prices are likely to see many workers continue to work from home at least some of the time. Rural dwellers may be more adversely affected as they often travel longer distances to access employment and various other services⁸. All of these factors reinforce the need for the speedy rollout of the NBP.

Target 2: On the second target, All populated areas* covered by 5G by no later than 2030*, is qualified somewhat by the accompanying two explanatory notes which are likely to be very important.

The definition of 'All populated areas' seems quite loose in the context of the explanatory note 4 and could exclude large parts of the Western Region.

Note 4: The 5G is to be made available in the cities, towns, and villages where people typically live and work, along transient and commuting routes and in areas that are of strategic importance to the local community.

⁷ <https://www.comreg.ie/media/2022/03/ComReg-2219.pdf>

⁸ WDC, 2001. [Transition to a Low Carbon Region](#) See Chapter Two.



Further explanation of the coverage of the 5G network will be required to understand the full implications for those living or working in rural areas. As noted earlier the Western Region is a largely rural region. The Census of Population, 2016, shows that in Ireland just over a third (37%) of the population live in rural areas (that is outside towns of 1,500). In contrast, the Western Region showed the opposite pattern with 65%—more than half a million people (535,953) living in the rural Western Region. It would be important to ensure that 5G extends as much as possible into rural areas.

Density is another key indicator of rurality and it certainly is important in considering the provision of services. The population density of the State is 70 people per square kilometre and in the more rural Western Region it is just under 32 people per km². There is some explanation for the differences in 5G coverage planned in note 5, but once more it is vague in definition. For example, how are ‘less densely populated areas’ defined below.

Note 5: The performance of 5G network coverage is expected to vary dependant on the density of population in the area covered and the performance required by users of the service. For example, in a city or suburban area the deployment of small cells will support requirements from smart city type users/applications with high throughput and low latency performance; whereas in less densely populated areas where macro cells are deployed, the throughput and other performance requirements might be lower.

Target 3: The third target to ‘Complete the delivery of digital connectivity to all Connected Hubs and all Schools by 2023’, is very welcome by the WDC. The WDC is the lead delivery agency under the Department of Rural and Community Development for the development of the Connected Hubs Network. Some of the BCPs are now included in the Connected Hubs network.

www.connectedhubs.ie.

Many of the hubs are located in rural areas and will be important centres for the provision of high-speed broadband to communities waiting for the NBP rollout to their home or workplace.

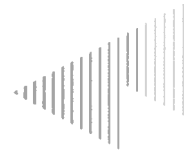
In support of this third target of the Digital Connectivity Strategy, the WDC would be happy to share the Connected Hubs online Arc Gis map with the National Broadband Plan team at the Department of Environment, Climate and Communications. This Connected Hubs online Arc GIS map could be overlaid with the NBI rollout schedule to see how realistic the 2023 target is and what level of service would be available.

Consultation Question 3

Are the strategic enablers set out in the State’s Digital Connectivity Strategy appropriate? Do these strategic enablers need to be amended? Are further strategic enablers, initiatives or measures needed?

The strategic enablers seem appropriate with the following additional comments:

- USO: the WDC would welcome a USO for broadband services, though how it will be defined is key. Also, given the ever increasing need for greater speeds, the USO minimum standard should be continually reviewed. How the USO will be enforced will also be important.
- The immediate deployment of high speed connectivity in key locations is appropriate. It is hoped that some of these locations are already served commercially or through the first phases of the NBP deployment.



- As noted above in the context of delivery of the third target;
Complete the delivery of digital connectivity to all Connected Hubs and all Schools by 2023,

the WDC would be happy to share the Connected Hubs online Arc Gis map with the National Broadband Plan team at the Department of Environment, Climate and Communications. This Connected Hubs online Arc GIS map could be overlaid with the NBI rollout schedule to see how realistic the 2023 target is and what level of service would be available.

- **Fostering the necessary ecosystems to facilitate the deployment of Smart city applications and services in urban/suburban, town settings & rural communities**

The WDC is involved in a variety of initiatives, some of which rely heavily on high quality broadband connectivity. The examples from Clare Island and the Future Mobility Campus in Shannon outlined below, illustrate two of these and show how high quality connectivity is vital in more rural parts of Ireland.

Clare Island -eHealth

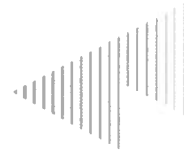
The Clare Island e-Health Living Lab project aims to make Clare Island a beacon for the delivery of e-Health and virtual health solutions through the innovative use of technology to support the delivery of care. The project seeks to support existing healthcare provision by creating a sustainable model for the integrated delivery of e-Health, virtual health, local health services and community care to the island in a manner that can be replicated. This will leverage the telecommunications capacity from the BCP. Ideally, the model can be scaled in the future to remote communities everywhere so that they have the same access to health care as anyone else in Ireland, helping to bridge the digital divide, not just between urban and remote communities but between islands and the mainland as well as between young and old.

However, the project needs to overcome connectivity issues as reliable broadband is not available across the island, making remote delivery of vulnerable people challenging. This lack of connectivity is compounded by the fact that Clare Island is not accessible by boat in bad weather. This makes proactive monitoring of healthcare essential as emergency hospital trips may require a helicopter ambulance. Enhanced rural connectivity is essential to maintain the sustainability of island living. It also creates opportunities for these communities to act as a testbed for innovation.

- **Facilitating the development of connectivity along our main Transport Corridors to support intelligent transport services in urban/suburban, town settings and rural communities.**

Connectivity will be needed along transport corridors to support intelligent transport systems such as real time data for public transport services as well as the development of connected and autonomous vehicles.

Public transport services are becoming increasingly 'intelligent' using real time data to support better service delivery and an improved customer experience. Real time data is not as widespread in rural areas as in urban areas though the need for it is just as great. Indeed rural transport services are often at a lower frequency and therefore real time data will be more valuable for users there. Spectrum needs to be available and deployed to rural areas to support better transport information.



Future Mobility Campus, Co Clare

The Future Mobility Campus Ireland, based in Shannon Co. Clare is partnering with companies such as Jaguar Landrover in Shannon to support the development of future mobility testbed facilities developed to create and deliver– in real world, ‘live’ settings – giving technology companies, software developers and researchers the opportunity to test and develop advancements in future mobility – spanning Connected, Autonomous, Shared and Electric (CASE) vehicles⁹. High quality connectivity is required to support this industry.

Consultation Question 4: The Department welcomes any views on the State structures, agencies and resources needed to oversee and ultimately secure the delivery of the Digital Connectivity Strategy?

There are a variety of agencies and Departments supporting the various developments aimed at improving digital connectivity. Information sharing could prove beneficial, ensuring there is clarity on various roles and responsibilities as well as avoiding duplication and/or ensuring there are not omissions or gaps in various aspects of service delivery. Types of information sharing could include interdepartmental groups, and/ or fora similar to the Mobile Phone and Broadband Taskforce.

Consultation Question 5: The Department welcomes any views on how to ensure a sufficiently skilled workforce, with the necessary competence and experience, is available to industry and the State so that Digital Connectivity Strategy can be delivered? The Department would welcome suggestions on the State’s role in encouraging the development of this workforce?

Ensuring there is a sufficiently skilled workforce is important, though the wider public as consumers of technology may also need support developing digital skills, see below.

Consultation Question 6: The Department welcomes any other general observations and views on the State’s Digital Connectivity Strategy and how it can be improved?

It will be important to ensure that the population as a whole is skilled to participate digitally. The levels of digital literacy vary across different groups. Various initiatives have been developed over the years. These should be reviewed and updated. Generally speaking the young are more digitally literate and there have been some initiatives supporting digital training of more senior citizens but the pace of technological change means that many may need support developing their digital skills.

The WDC is pleased to make this submission to the consultation on the Digital Connectivity Strategy for Ireland 2022. If there are any queries concerning this submission, please contact me.

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⁹ <https://futuremobilityireland.ie/>