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Dear Sirs

Please find attached a submission from Dublin Port Company.

Regards

Eamonn O'Reilly



**Alexandra Basin
Redevelopment Project**
Facilitating growth at
Ireland's No.1 Port



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Dublin Port Company Alexandra Basin Redevelopment Project | Co-financed by the European Union (Connecting Europe Facility)

See Dublin Port Company's first major project under the Masterplan 2012 - 2040. Alexandra Basin Redevelopment -- www.dublinportabr.ie



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Dublin Port submission to Eastern & Midland Regional Assembly Draft RSES

16th January 2019

There are ten places within the Draft RSES where Dublin Port is referenced. We have commented on each of these references as follows:

1. Page 12:

The Eastern and Midland Region is the economic engine of the State and is on the trans-European network linked to Liverpool across the Irish Sea and to Belfast along the M1 Corridor. The Dublin region is the main global gateway to Ireland, with Dublin airport one of the fastest growing in Europe and continued growth in international exports through Dublin Port. The Eastern (mid-east) counties have the benefit of proximity to Dublin and a strong tourism and leisure offering as well as good national and international connectivity. The Midlands are a dynamic region, centrally located in the heart of Ireland with a high-quality environment and quality of life and unparalleled national interconnectivity.

Comment: By comparison with the national economy (where the value of exports greatly exceeds the value of imports), imports account for 60% of Dublin Port's trade and this import trade feeds domestic consumption. Dublin Port's national importance arguably derives more from its role in facilitating the importation of goods which Ireland does not produce than from the facilitation of the export of goods.

While exports are important, they make up only 40% of the Port's volume. We would suggest rewording the above text to say, perhaps:

...with Dublin Airport one of the fastest growing in Europe and Dublin Port supporting the national economy by facilitating both the import of goods for domestic consumption and the exports of Irish goods particularly from the food and drinks sectors.

2. Page 28:**Growth enablers for the Dublin metropolitan area include:**

- To achieve growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031
- To realise ambitious compact development targets at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other metropolitan settlements
- To deliver identified strategic development areas along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of sites
- Re-intensify employment within the city and deliver strategic employment development areas to strengthen enterprise ecosystems and sustain national economic growth
- Enhance co-ordination across Local Authorities and relevant agencies to promote more active land management and development of under-utilised, brownfield and public lands
- Protect and improve access to the global gateways of Dublin Airport and Dublin Port

Comment: No comment.

3. Page 67

5.3 Guiding Principles for the growth of the Dublin Metropolitan Area

To achieve the Vision the MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area:

- Dublin as a global gateway** - Improve access to Dublin Airport by public transport and road and facilitate the continued growth of Dublin Port and improved access to/from the southern port area.
- Compact sustainable growth** - Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements.
- Integrated transport and land use** - Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including BusConnects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.
- Accelerate housing delivery** - Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.
- Employment density in the right places** - Re-intensify employment within the city and suburbs, activate strategic employment opportunities to complement existing employment hubs in the city centre, and near third level institutes.
- Better alignment of growth** - Target 'catch up' investment to support employment, infrastructure and amenity provision and/or sustainable transport links in towns that have experienced a high level of population growth but are reliant on other areas for employment and/or services.
- Social regeneration** - Realise opportunities for social as well as physical regeneration, particularly in areas of relative deprivation including parts of the Dublin Docklands and inner city, Ballymun, Ballyfermot, and the western suburbs.
- Future development areas** - Having regard to the long lead in time for planning and development, identify future growth areas such as Dúnorik, Swords, Uppervalley and Naas Road that may be delivered beyond the lifetime of the draft RSES within the long term 2040 horizon of the NPP.
- Metropolitan scale amenities** - Provision of regional parks and strategic Green Infrastructure including greenways / blueways along the canals, rivers and the coastal corridor as part of the implementation of the NTA Greater Dublin Area Cycle Network Plan.
- Enabling infrastructure** - Identify infrastructure capacity issues and ensure water / waste water needs are met by national projects and improve sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation.
- Demolition and active land management** - enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and land management policies that focus on the development of under-utilised, brownfield, vacant and public lands.

Comment: As Dublin Port grows, road traffic volumes are increasing on the national motorway network to the extent that access from the Dublin Port Tunnel could become an issue in the future due to capacity constraints not in the tunnel itself but in the receiving road network which connects into the tunnel. It is suggested, therefore, to amend the above wording as follows:

... facilitate the continued growth of Dublin Port with improved access to/from the southern port area and by ensuring the availability of road capacity for the movement of goods on the national motorway network.

4. Page 73

KEY TRANSPORT INFRASTRUCTURE
INVESTMENTS IN THE METROPOLITAN AS
SET OUT IN NATIONAL POLICY INCLUDE;

Roads

- M4 Maynooth to Leixlip
- M11 from Jn 4 M50 to Kilmacanogue
- N3 Clonee to M50
- M50 Dublin Port South Access
- Adamstown and Nangor Road Improvements.

Comment: The Eastern Bypass is potentially very expensive and any proposal to develop it will be hugely controversial. The reference of “M50” at the start of the fourth bullet point explicitly implies that the Southern Port Access Route (SPAR) would be a motorway extension of the Dublin Port Tunnel. This, in turn, implicitly suggests that the Southern Port Access Route would be another part of an ultimate Eastern Bypass.

Linking the SPAR to a possible future Eastern Bypass could, unnecessarily, create planning difficulties for DOC in the future.

It is possible to envisage the SPAR independently of a possible future Eastern Bypass particularly if there is no interchange on the Poolbeg Peninsula for a possible future Eastern Bypass.

In order to facilitate a Southern Port Access Route either as an independent standalone route or alternatively as an element of a possible future Eastern Bypass, it is suggested to change the fourth bullet point to simply read:

- *Dublin Port Southern Port Access Route (SPAR)*

5. Page 73

Metropolitan Greenway Network

Greenways are high quality cycleways generally segregated from traffic, and often through parks and areas of high amenity value such as coastal, canal and riverside routes. Where greenways pass through a designated environmental area, careful environmental assessment, routing and design will be required to avoid significant impacts on habitats and species.

A number of greenways are of strategic value in terms of their length as an amenity, as a means of providing access to major recreational areas in the mountains, on the coast or in significant public parks, and also as part of a connected Strategic Metropolitan Greenway Network. They include:

- East Coast Route from Sutton to Sandymount and extending north to link into the Fingal Way with potential to create a wider East Coast Trail from Rosslare to Northern Ireland
- Royal Canal Greenway from Spencer Dock through the northern inner suburbs along the canal to Maynooth and Mullingar with potential to link into the Dublin to Galway Eurovelo route
- Grand Canal Greenway from Docklands through the southern inner suburbs to Naas, Newbridge and Kildare joining the Barrow Way at Athy with potential to link to Cork
- River Liffey Greenway from Dublin Port along the Liffey Quays to Leixlip. Cross-connections are proposed through the Phoenix Park linking the Royal Canal to the Grand Canal
- Dodder Valley Greenway, from Grand Canal Dock along the river corridor which passes largely through public parks in the southern suburbs to the Dublin Mountains at Bohernabreena
- Western Canals Loop; a 40km long recreational city loop linking the Grand Canal at Adamstown to the Royal Canal at Leixlip via Griffeen Valley Park, Lucan and the Liffey Valley

Comment: In 2020, Dublin Port will construct a 4km recreational greenway (walking and cycling) on the northern fringe of the Port overlooking the Tolka Estuary. Furthermore, DPC has obtained planning permission to link this route westwards to Alfie Byrne Road (through East Point Business Park) and southwards via a new bridge across Promenade Road to East Wall Road. These latter elements could provide a key link in the Sutton to Sandymount route. It is suggested to add an additional bullet point above as follows:

Dublin Port 4km greenway overlooking the Tolka Estuary with associated links westwards to Alfie Byrne Road and southwards to East Wall Road to provide a key link in the Sutton to Sandymount East Coast Route.

6. Page 121

Dublin Bay Biosphere

In 1981 UNESCO designated North Bull Island in Dublin Bay as a Biosphere because of its rare and internationally important habitats and species. To support sustainable development, UNESCO's concept of a Biosphere has evolved to include not just areas of ecological value but also the communities that live and work within these areas. In recognition of the environmental, social and economic importance of Dublin Bay the Biosphere was expanded in 2015 to cover the entire Bay and adjoining terrestrial zone, where over 300,000 people live and work.

The Biosphere is managed by the Dublin Bay Partnership, which includes the Local Authorities, Dublin Port Company, Fáilte Ireland and the NPWS. The partnership works with communities, universities and schools to develop opportunities for people and nature to connect, including guided tours, citizen science events, becoming a volunteer or joining the research network. The development of Biosphere branding also offers opportunities for the marketing of sustainable business and biosphere products.

Comment: No comment

7. Page 150

Table 8.4: Road Projects for the Region

- M7 Naas to Newbridge bypass widening
- Osberstown Interchange and Salins Bypass
- N52 Ardee Bypass
- N2 Siane Bypass
- Salins Bypass
- Adernstown and Nangor Road Improvements
- Portlaoise Southern Distributor Road
- Laytown to Bettystown Link Road
- Athy Southern Distributor Road
- N2 Rath Roundabout to Kilmoon Cross
- N2 Ardee to south of Castleblaney
- M4 Maynooth to Leixlip
- N4 Mullingar to Longford (and Sligo)
- M11 from Jn 4 M50 to Kilmacanogue
- N52 Tullamore to Kilbeggan
- N3 Clonee to M50
- M50 Dublin Port South Access

Comment: As discussed in Point 4 above, it is suggested to change the final bullet point to read:

- *Dublin Port Southern Port Access Route (SPAR)*

8. Page 154

The NPF includes *High-Quality International Connectivity* as a National Strategic Outcome and recognises the crucial role that the provision of high-quality international connectivity has for overall international competitiveness and addressing opportunities and challenges from Brexit through investment in our ports and airports, in line with sectoral priorities already defined through National Ports Policy and National Aviation Policy and signature projects such as the second runway for Dublin Airport and major redevelopment at Dublin Port including proposals for a southern port access route.

Comment: It is suggested to amend the last sentence to read:

*...and major redevelopment at Dublin Port as described in Dublin Port Company's **Masterplan 2040 (reviewed 2018)** including a Southern Port Access Route (SPAR).*

9. Page 155

Sea Ports

Ireland's port and shipping services play an important role as enablers of economic growth. Irish ports are critical infrastructure for international trade, with over 90% of our international trade moving by sea. Ports also serve as logistics and distribution hubs. The EMRA Region is home to the largest sea port in the country - Dublin Port - and also contains a number of regional ports of significance and smaller harbours. These include Arklow, Drogheda, Dundalk, Dun Laoghaire, Greenore, Howth, Wicklow and Warrenpoint in Northern Ireland.

Given the nature and function of ports combined with the location interfacing with the marine environment, there is potential for environmental conflict with the existing ecosystem. This sensitivity is further increased by the proximity of most of our Region's ports to designated sites. The approach to port development in the Region shall adhere to the European Commission guidelines on the Implementation of the Birds and Habitats Directives in Estuaries and Coastal Zones.

As required by National Ports Policy (2013), a National Ports Capacity study has been commissioned which will assess the capacity of the national ports network. The maritime economy and its role as an enabler in effective regional development is discussed further in Chapter 6: Economy and Employment.

In terms of port facilities, National Ports Policy and the national hierarchy or tiering of ports recognises the long-term international trend in ports and shipping towards increased consolidation of resources in order to achieve optimum efficiencies of scale. This has knock-on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections. National Ports Policy seeks to ensure that the strategic development requirements of Tier 1 Ports, ports of regional significance and smaller harbours are addressed to ensure their effective growth and sustainable development at a national and regional level.

The Assembly supports the role of all ports in the Region and seeks to harness economic opportunities from the ocean economy and the Ports in the Region in realising the full potential of the ocean economy. Particular regard is had to the Government's integrated plan for the marine industry - Harnessing Our Ocean Wealth (2012), the National Marine Research and Innovation Strategy 2017-2021 (Marine Institute Ireland, 2017), and Ireland's Ocean Economy (NUIG, 2017). EMRA supports the undertaking of a feasibility study to examine the different options and potential for facilitating offshore renewable energy development at ports.

Comment: It is suggested to add the following sentence at the end of the second paragraph:

In order to minimise potential impacts on EU protected habitats, brownfield port developments which maximise the capacity of existing port sites should be prioritised over greenfield developments.

10. Page 156**Dublin Port**

Dublin Port is the largest port in the country handling almost 50% of all trade in Ireland and growth of 25% over the last four years. In 2017 there was a record throughput of 36.4 million gross tonnes, a 4% increase on 2016. Dublin Port is one of five major ports classified as Tier 1 / Tier 2 ports in National Port Policy and categorised as core / comprehensive ports in the EU's TEN-T network. Dublin Port is recognised in this draft RSES as a critical national facility a key economic driver for the Region and the nation and an integral part of Dublin City, in line with the Dublin Port Masterplan 2040 (reviewed 2018).

Regional Ports

The regional ports are recognised in this draft RSES as important centres of economic activity, and the draft RSES seeks to protect and support the role of regional ports as economic drivers for the Region. This includes ports located at Arklow, Drogheda, Dundalk, Dun Laoghaire, Greenore, Howth, Wicklow and Warrenport in Northern Ireland.

REGIONAL POLICY OBJECTIVES:**Ports**

RPO 8.19: EMRA will support the role of Dublin Port as a Port of National Significance (Tier 1 Port) and its continued commercial development, including limited expansion and improved road access, including the Southern Port Access Route.

RPO 8.20: EMRA supports ports of Regional Significance that serve an important regional purpose and/or specialised trades or maritime tourism, and the accessibility requirements of regional ports within the Region, from within their regional catchments will be addressed through the provision of improved access routes, where necessary and improved access to the national and regional road networks. Opportunities for the use of rail, where such ports are connected to the rail network is also promoted.

RPO 8.21: EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.

RPO 8.22: EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.

Comment: It is suggested to update the first sentence in the first paragraph to read:

...and growth of 36% over the last six years. In 2018, there was a record throughput of 38.0 million gross tonnes, a 4.3% increase over 2017.