

Eastern and Midland Regional Assembly  
3rd Floor North, Ballymun Civic Centre  
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Ballymun  
Dublin

23rd January 2019

**Re: Submission to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region**

A Chara,

Doyle Shipping Group (DSG) welcome the publication of the draft Regional Spatial and Economic Strategy (dRSSES) for the Eastern and Midland Region and the opportunity to participate in the consultation process. On behalf of DSG, McCutcheon Halley Planning Consultants previously submitted comments (see **Appendix 1**) on the *Issues Paper* and the matters raised remain relevant to this consultation.

This consultation is timely given the challenges arising from the imminent withdrawal of the United Kingdom from the European Union on 29<sup>th</sup> March 2019. In the absence of an agreed exit strategy, it is widely acknowledged that the implications for Ireland will be far reaching, impacting every aspect of the State's economic functionality. Trade flows, supply chains, economic and business operations, the labour market and consumer confidence and spending will all be vulnerable to the threats posed by Brexit.

The UK land-bridge is key for Irish trade with the rest of the EU and further afield. The ESRI (2017) estimated that 53 per cent of Irish goods exports to all countries other than the UK are transported via the UK. The introduction of border procedures between the UK and Ireland and between the UK and the continent would impact the efficiency and speed of land bridge routes. In addition, the UK may apply road charging schemes or other cost-adding or time-consuming rules, which will affect the cost of trade between Ireland and the continent as a result of Brexit. The existing alternative sea routes to the continent do not have sufficient capacity to cope with massive shifts in volumes from the UK land bridge.

Brexit will also present trade opportunities, just as Irish exporters will face new barriers in the UK market, so will UK exporters in the EU market. This implies that UK products or services will be more expensive in the EU market, meaning that customers in other EU countries currently served by UK firms will be looking for alternative suppliers. This can present opportunities for Irish exporters, especially since there are many overlaps in the products exported from the UK and from Ireland.

The Government's key priority is to take all the necessary and possible steps to ensure that trade, including priority imports, can continue to flow with the UK as a third country. Mitigating challenges and maximising opportunities requires a coordinated response from policy makers, including the Eastern and Midland Regional Assembly.

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Our previous submission to the *Issues Paper* outlined in detail the capacity constraints that Dublin Port is facing. This is further reinforced in the Government's *Contingency Action Plan* (December 2018) which highlights the immediate infrastructural challenges that Dublin Port faces including the need for additional parking bays for HGV and office accommodation to manage the new custom controls. The Plan emphasises that there is a need to identify additional physical capacity at ports for a no deal Brexit scenario.

In light of this, we wish to draw the Assembly's attention to the information contained in our response to the *Issues Paper* consultation. The submission highlighted Greenore Port's attributes including its strategic location on the Dublin-Belfast corridor, its access to natural deep-water, its extensive undeveloped landholding and the immediate commitment of its owners to invest in the necessary infrastructural requirements.

The changes required to manage east-west trade flows in a no deal Brexit scenario require a concerted and consistent response from all policy makers. The Government has unambiguously set out the infrastructural constraints and all policy makers must respond in a coherent manner to establish the policy environment needed to address the imminent challenge.

The policy contained within the RSES will play a critical role as it sets the spatial Regional Strategic Outcomes (RSOs) that Development Plans must be consistent with.

We welcome the recognition in the dRSES of the need for targeted investment in transport infrastructure, particularly along the Dublin – Belfast Corridor. *Regional Policy Objective (RPO) 8.9* seeks to “Support the improvement, and protection, of the EU TEN-T network and the strategic function of the Dublin to Belfast road network”. It is however unfortunate that the opportunity to name specific projects or actions, such as the future development of Greenore Port, that could support the region's existing transport infrastructure has not been seized and we respectfully request that this is given consideration in advance of the publication of the final RSES.

*Regional Policy Objective 8.19* identifies the importance of Dublin as a Tier 1 Port of National Significance but notes its continued commercial development is constrained. Greenore Port however, also situated along the critical spine connecting North and South, is the only other deep-water port, poised to capitalise on future growth opportunities and attract private investment. We submit that Greenore Port should be given appropriate recognition within the Strategy as a key component of the region's transport infrastructure.

Within the draft Strategy, EMRA recognises the role of regional ports, including Greenore, as “important centres of economic activity”. Again, it seems that the opportunity to drive growth in this location and so contribute to the economic viability and prosperity of the Eastern and Midland region has been overlooked through an absence of targeted actions.

## Conclusion

The draft Strategy is largely silent on how the region's port infrastructure can be exploited to capitalise on the future potential of existing assets like Greenore Port. As the state's only privately-owned port, it has the ability to attract privately funded investment. However, there is a need for naming of specific infrastructure projects and providing a detailed policy framework in order to direct regional spatial policy objectives and provide appropriate levels of investor certainty.

Staying connected and competitive in a globalised society is critical to the State's economic success. Ireland's connectivity as an island nation on the periphery of Europe and the uncertainty of Brexit are key challenges. Comprehensive policy and actions are thus critical to supporting businesses getting goods on and off the island.

It is well recognised that ports act as engines of regional economic growth and that shortfalls in port infrastructure capacity could result in serious damage to the economy. This submission highlights the opportunity that Greenore Port offers the Eastern and Midlands Region.

It is the hope of DSG that the contents of this submission will be considered and may be used to further inform the RSES prior to its adoption, by inclusion of more specific policy provisions that would support the future development of Greenore Port.

We thank EMRA for the opportunity to make a submission at this time and would welcome the opportunity to meet with the Assembly to deliver a brief presentation of DSGs Masterplan. We look forward to working with you in the future.

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Paula Galvin

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16<sup>th</sup> February 2018

**Re: Submission to the Eastern and Midland Regional Spatial and Economic Strategy Issues Paper on behalf of Doyle Shipping Group**

A Chara,

Doyle Shipping Group (DSG) welcome the publication of the Eastern and Midland Regional Spatial and Economic Paper *Issues Paper* and the opportunity to participate in this first stage of the plan formulation. The enhancement of the regional planning function by combining economic strategy with the spatial strategy to foster regional growth is to be commended.

The forthcoming Regional Spatial and Economic Strategy (RSES) will inform the spatial development of the Eastern and Midlands Region with county and local plans required to be consistent with the policies of the RSES. Infrastructure development requires certainty in terms of both planning and economic policy; without this investor confidence is eroded and as a consequence commercial viability is threatened.

### Doyle Shipping Group

DSG is the largest independent provider of shipping agency services and logistics in Ireland, providing a range of marine services including stevedoring, ships agency, chartering, project cargo terminal management, warehousing, forwarding, ship repair, tug hire and passenger ferries. The company has a dedicated workforce of over 500 people and has offices and warehouses in all the major Irish ports, including Dublin, Belfast and Foynes, and owns and operates three private port facilities; Cork Dockyard and Passage West in Cork Harbour and Greenore Port in Louth.

### Purpose of Submission

It is well recognised that ports act as engines of regional economic growth and that shortfalls in port infrastructure capacity could result in serious damage to the economy. The purpose of this submission is to highlight DSGs future development proposals for Greenore Port to the Eastern and Midlands Regional Assesmbly and to demonstrate how its further development could assist with responding to well-documented capacity constraints in a timely manner, thereby achieving a sustainable and efficient port sector within the Region.

Currently, the National Ports Policy (NPP) 2013, which competent authority's must have regard to in making decisions on port development proposals is not strictly applicable to Greenore Port. This is because it occupies the unique position of being a privately owned and operated port. To ensure certainty for investors and those

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involved in the development consenting process including third-parties, it is critical that the future development of Greenore Port is given recognition. DSG are thus seeking support from the Eastern and Midlands Regional Assesmbly through the RSES to bring about this much needed certainty.

## Port Infrastructure

Staying connected and competitive in a globalised society is critical to the State's economic success. Ireland's connectivity as an island nation on the periphery of Europe and the uncertainty of Brexit are key challenges. Comprehensive policy and actions are thus critical to supporting businesses getting goods on and off the island.

## National Constraints

Ireland is falling behind most of our European neighbours in terms of infrastructure investment. The World Bank's *Global Logistics Performance Index* for 2016 revealed that Ireland was ranked 18<sup>th</sup>, far behind Germany in first place and the UK in 8<sup>th</sup> position. On its quality of trade and transport infrastructure which includes ports, Ireland is ranked 22<sup>nd</sup>. On efficiency of the export-import clearance process by border control agencies, which includes customs, Ireland is ranked in 25<sup>th</sup> place.

Ireland's National Competitiveness Council, *Benchmarking Competitiveness: Ireland and the United Kingdom* (2017) highlights that Ireland's sea ports require significant investment for both routine maintenance and new project builds. The overall grading system allocated to Transport, including ports, is 'C' – mediocre i.e. inadequately maintained, and / or unable to meet peak demand, and requiring significant investment.

The imminent infrastructure challenges are further highlighted by Data from the Central Statistics Office (CSO) demonstrating that the volume of goods handled at Irish Ports in 2016 is returning to pre-recession growth levels.

## Dublin Port Constraints

Dublin Port handled 36.4m tonnes in 2017, an increase of 30.1% over a 5-year timeframe and it is anticipated that volumes will continue to grow to an estimated 77m tonnes in 2040.

Dublin Port Company (DPC) have highlighted their constraints, in particular, the finite nature of its 260-hectare estate and environmental sensitivities. Most recently, a press release published on [www.dublinport.ie](http://www.dublinport.ie) states "By 2040, Dublin Port will have reached full capacity. In three years' time we will begin the 20-year project to build new and additional port facilities elsewhere on the east coast..." (12<sup>th</sup> February 2018).

DPCs Masterplan 2012-2040 sets out capacity projections for the port and the associated challenges it faces, regarding;

- Ro-Ro Requirements – the Plan states that if existing trends continue, the provision of sufficient land for unaccompanied ro-ro would prove difficult. A further 24.4 hectares would be required to handle projected volumes by 2040 and this land would need to be close to the existing ro-ro berths. Based on current land usage and in light of the loss of some ro-ro capacity, if the proposed cruise berths are built on the north Quay extension, some element of new land through reclamation would be required to meet demand.
- Lo-Lo Requirements – the Plan highlights that additional berths and facilities may be required and if the size of container ships increase deeper berths would be required.
- Bulk Solids – these include agricultural, energy, mining and construction sector products and anticipated trade levels would require consolidation of existing areas and additional facilities would be

needed to accommodate growth in specific commodities e.g. solid biomass. The Masterplan is silent on where these additional facilities would be accommodated.

In 2014, DPC published its Franchise Policy, highlighting that against a background of rising cargo volumes, the primary and desired use for all lands is for the transit storage of import and export cargo. To achieve this, DPC are seeking to displace all non-core activities including storage and repair of empty containers, haulage company operations, road vehicle maintenance and warehousing. These activities occupy 40.8ha and according to DPC can be undertaken outside the port estate.

The Franchise Policy sets land utilisation targets for port operators and includes objectives to introduce short-term franchises in the order of 5-10 years with a possibility of open tenders at the end of the period. It envisages that as volumes grow, the pressure on land and berths will increase and the opportunities for general stevedores will become more constrained. Thus, traditional low value and land hungry cargoes will become a thing of the past at Dublin Port, as is already the case for cargoes such as timber and steel.

In a presentation to Engineers Ireland entitled *“Dublin Port’s Challenge to Keep Pace with Growth”*, the Chief Executive of DPC, Mr. Eamon O’Reilly, emphasised that land capacity is the greatest constraint to future development. He highlighted that the assumed growth of 2.5% per annum presented in the Masterplan was underestimated and the current assumption is 3.3% growth or 77m gross tonnes by 2040, rather than the projected 60m presented in the Masterplan. Critically, regarding infrastructure, Mr. O’Reilly stated, *“Dublin Port is always one major planning refusal away from serious capacity constraints”*.

## Conclusion

The efficiency and effectiveness of the Region’s port infrastructure has a strong bearing on the competitiveness of indigenous firms and under-investment will have a significant negative effect on the Region’s economy. A cost efficient and timely way to achieve much needed investment is to provide clear policy direction in the forthcoming RSES. The strategy must convey existing constraints and identify existing infrastructural assets that if maximised would alleviate capacity issues. In this way, certainty would be realised and investment in infrastructure would be encouraged in a plan led manner.

The Eastern and Midlands Regional Assembly are clearly aware of the impending need for alternatives to Dublin Port and DSG welcome the inclusion of the key question *“What is the potential for future development of regional ports?”* within the Issues Paper.

Greenore Port is defined as a port of regional significance within the National Ports Policy (NPP) 2013. These are ports that serve an important regional purpose and/or specialised trades or maritime tourism and the NPP recognises the importance of these ports in serving their hinterlands and in supporting balanced regional development. It is however regrettable that the NPP states *“in the context of the long-term international trends in ports and shipping, these ports are limited in their future potential as centres of commercial shipping”*. Such a statement contributes to investor nervousness and provides ‘a stick’ for third parties in the development consenting process. The forthcoming RSES presents an opportunity to reverse this and to provide an environment of certainty for all parties, thus facilitating the development of a sustainable port sector that will assist with achieving wider economic goals in the region.

## Greenore Port

### Introduction

DSG acquired Greenore Port in 2014. The port was previously jointly owned by One51 and the state-owned Dublin Port Company. Greenore Port’s potential has been recognised by An Bord Pleanála, which has described it as one of Ireland’s *“critical infrastructure assets.”* Since taking ownership, DSG have invested 4

million euros and envisage investment of up to 17 million euros over the next 5 years.

The Port has a long history, being operational for the past 140 years. In 1963, it was the first port in the Republic of Ireland to handle containerised traffic and during the 1980s when container traffic started to move to the larger developing ports of Dublin and Cork, Greenore began handling large volumes of bulk cargoes as well as playing a pivotal role in the export of live cattle and frozen beef to the Middle East during the 1980s and 1990s.

## Location

Greenore port is strategically located roughly mid-way between Dublin and Belfast and it has direct access to a high-speed transport network, the M1 motorway, by 15km of uncongested regional route (R175), making it one of the one most easily accessible ports in the Country. It has a wide and accessible hinterland both within the Region and extending into Northern Ireland.

The port is located on the Dublin-Belfast Economic Corridor and recent projections suggest that approximately 4 million people will live within the corridor by 2030. This scale and density would give it the potential to become a significant European growth centre. To achieve this, the advantages of the corridor must be strengthened, and this can be achieved by optimising its exiting infrastructure. In turn, the area would be increasingly attractive to foreign direct investment (FDI) thereby increasing the growth of the island economy.

## Current Operations/Activities

Today, Greenore Port is Ireland's only privately owned commercial port, with a total landholding of c.23 hectares providing over 40 direct jobs. It has approximately 275m of quayside space comprising two berths which can cater for vessels with a draft of 8.5m, a length of 200m and 60,000 tonnes dead weight. Importantly, it is the only deep-water port on the east coast of the Republic of Ireland outside of Dublin. It has the required natural features and is ideally located to act as a counter magnet to Dublin Port and would not require State investment for the construction of a new port as has been suggested in the recent past. There is a growing trend in the industry for larger, deep sea, more efficient vessels which provide customers with economies of scale which highlights the significance of deep water ports in the country.

The port provides marine and logistical support for sectors including, agricultural feed, construction, renewable energy, livestock exports and manufacturing industries. It is the leading port in Ireland for the importation of reinforced steel, accounting for c.80% of national imports. It has pilotage, tugboats and communications available with several large warehouses. Openhydro's headquarters are based in Greenore Port, where they provide employment for approximately 80 people in research and development and fabrication of ocean energy technology.

On acquiring the port, DSG immediately moved to reverse the sustained under-investment that took place under the watch of previous owners and has invested 4 million euros in upgrade works. The works completed to date include the delivery of warehousing, offices, craneage, dredging and storage areas. The result is that throughput has increased from 500,00 tonnes in 2014 to almost 800,000 tonnes in 2017, a 60% increase. Direct employees have increased by more than 30% and indirect employment (hauliers) has increased by 140%.

In 2016, 2No. permissions were secured from An Bord Pleanála (Ref. PL.15.246093 & PL15.246577) to develop lands for the open storage of port cargoes on a combined area of c.4 hectares.

In 2017, planning permission was secured (Reg. Ref. 17/413) for the refurbishment of Berth No. 2. The development comprises dredging of the harbour, rehabilitation works to the quay wall and construction of a

new quay wall and provision of berth infrastructure. A Foreshore Licence is necessary to commence the works, and this is currently being processed.

ADM Arkady Ireland Ltd., a client of Greenore Port, import agricultural commodities and resell them primarily as feed ingredients and as raw materials for the agricultural processing industry. Currently, ADM are not importing high protein feedstuffs such as corn, maize etc. into Greenore Port as there is no storage available. Instead much of the feedstuff for the north-eastern market is imported through Warrenpoint Port in NI. Thus, RoI is losing out on taxes e.g. import duties to the UK Government. Planning permission (Reg. Ref. 16/842) was secured from Louth County Council for the development of grain storage silos on the quayside at Greenore Port in 2017 and construction is underway.

## Masterplan

There is vast potential to further develop the port's estate and DSG are committed to investment. Recognising that a planned approach to development is necessary to clarify and communicate the port vision to all stakeholders, DSG engaged MH Planning to prepare a non-statutory Masterplan for the period 2017-2023. The significance of the end year is that it marks the 150<sup>th</sup> anniversary of Greenore Port. The Masterplan provides a strategic framework for development and is informed by economic, social and environmental factors.

It is estimated that a capital expenditure of 17 million euros is required to deliver some of the more immediate proposals outlined in the Masterplan, including; additional craneage, refurbishment of Berth No. 2, expansion of an existing warehouse and replacement of ageing plant.

Some of the immediate key investment priorities include;

- Berth No. 2 refurbishment
- Extend Open Storage Areas – an application is being prepared for permission to extend the recently permitted open storage northward into an existing Greenfield area. The application will also include for a new left entry only from the R175 to eliminate HGV movements from residential areas.
- Existing Warehouse Expansion – to service the quayside needs of existing Clients and to modernise the port's facilities it will be necessary to increase the footprint of the existing warehouse and raise the existing ridge height. This investment will also service the displaced business from Dublin Port who are no longer permitting warehouses to be built near their quay walls.

In the longer term, DSG will consider the viability of developing additional warehousing and a RoRo / LoLo container terminal

## Brexit

DSG welcome the opportunity to respond to a key question presented in the Issues Paper *"How can we enable the development of a sustainable regional economy with strong resilience to external shocks such as Brexit?"*

The World Bank's Global Logistics performance report for 2016 ranked Ireland in 22<sup>nd</sup> place for its quality of trade and transport infrastructure such as ports, railroads, roads and information technology, far behind the UK in 5<sup>th</sup> position.

The vice-president of the European Investment Bank (EIP), Mr. Andrew McDowell speaking at a conference in Dublin on Investing in the Future of Europe in November 2017 stated that the *"big risk"* in relation to Britain's exit from the European Union was that it would *"change Ireland's trade routes"*. *"New ports and airports and other infrastructure connections will be needed to accommodate this, which will add to the existing shortfall in infrastructure needs. Infrastructure preparation will take several years so we need to be on top of this right now"*



*with good planning and marshalling all available resources. Without these investments, we risk stalling the recovery in the context of Brexit.”*

The report by Ireland's National Competitiveness Council, *Benchmarking Competitiveness: Ireland and the United Kingdom, 2017*, states the UK is, and will remain, a key trading partner for Ireland. It is also a country with which we compete in terms of mobile investment and export market share. In the run-up to, and post-Brexit, we can expect the UK to intensify their investment in infrastructure and the report shows that Brexit requires Ireland to place an increased emphasis on enhancing the factors driving our competitiveness performance.

Against this background, the RSES must exercise prudence and plan for a hard Brexit given that a high proportion of our goods trade, in volume terms, is either with or passes through the UK. To do this, the Region must put in place policy that would facilitate the future proofing its port infrastructure to ensure it can withstand external shocks.

DSG are demonstrating their commitment to developing the port further in the immediate term and it can thus offer a real alternative for the well documented capacity constraints at Dublin Port and the over reliance of the Region on Dublin Port for unitised freight traffic, 83.5% in 2015. This over dependence on a single port raises serious supply security issues.

The fact that Greenore Port is a privately-owned entity and DSG are committed to financing its further development means that the structural changes required to future proof against a hard Brexit can be implemented swiftly when compared with other models of port ownership.

The redistribution of freight movements from Dublin to Greenore would improve national supply security, facilitate balanced regional development and benefit the Dublin region by reducing freight traffic. The re-routing of traffic would not require capital investment for road infrastructure as it is already operational.

## Policy Alignment

Critical to the success of the Greenore Port's master planning process is the support offered to the port vision through external regulatory instruments and regional and local policies.

### National Ports Policy, 2013

Greenore Port is unique, in that it is Ireland's only privately owned commercial port and the National Ports Policy (NPP) only applies to ports under the control of the Department of Transport, Tourism and Sport. However, Greenore Port is identified within the NPP as a port of regional significance and regrettably these ports are described as *“limited in their future potential as centres of commercial shipping”*. This assertion is an impediment to the future growth and development of Greenore Port.

Greenore Port is currently handling much larger vessels compared to other ports of regional significance. In comparison with some of the listed Tier 2 ports, e.g. Rosslare and Waterford, Greenore has superior infrastructure available, such as stevedoring facilities. In addition, the port which is handling the most tonnage out of the 'ports of regional significance' is Drogheda, the largest vessel they can cater for is approx. 120m in length, while Greenore can accommodate vessels of 200m.

Although Greenore Port is not handling tonnages similar to Waterford, the port has the capacity to handle bigger ships compared to the 190m vessels that Waterford can handle.

Upon completion of the proposed investment in Greenore Port, by 2019 the Port will be able to accept vessels of 225m in length and 75,000T deadweight. The only ports in the Republic of Ireland capable of this will be the Tier 1 Ports and Greenore.

### Draft National Planning Framework

The stated overarching objective of the draft National Planning Framework (NPF) is to provide a long-term strategic planning framework to guide national, regional and local planning and investment decisions. Section 6.3 of the draft NPF gives primacy to those ports listed as Tier 1 and Tier 2 in the NPP. The draft NPF gives no recognition to privately owned ports and this omission may serve to unintentionally restrict the development of Greenore in the future.

It is regrettable that the draft NPF does not identify Greenore Port in the same way it does Bellview and Europort, as a port with potential for growth and expansion. Greenore offers a suite of attributes including deep-water, a significant quantum of undeveloped land, the closest port to one of the State's key trading partners (the UK) and within easy reach of the M1 Dublin-Belfast corridor. Greenore thus offers characteristics that if recognised and supported would contribute well beyond its immediate environs.

### Regional Spatial and Economic Strategy

Ports and related land-side logistics chains are critical to the competitiveness of the Eastern and Midland Region, which rely on them to deliver business inputs and to take exports to the global market.

The forthcoming RSES will inform the regulation of development at the County level. Overcoming delays in implementing infrastructure projects is vital to ensuring the timely delivery of infrastructure. We would thus encourage that recognition be given to Greenore Port through specifically referencing the port and its potential to contribute to the spatial and economic strategy of the Eastern and Midlands Region.

In doing so, the RSES would contribute toward protection of this critical port infrastructure through providing the much-needed supporting policy framework to assist with the delivery of the proposed Masterplan at the operational level. Additionally, clarifying/confirming the importance of Greenore Port to the Region would assist with achieving regulatory alignment at all levels within the Planning Hierarchy. It would also provide increased transparency for port stakeholder; current and future port tenants, local/interfacing communities and environmental interest groups.

### Conclusion

This submission highlights the opportunity that Greenore Port offers the Eastern and Midlands Region. It seeks the support of the Assembly to assist with ensuring that the port realises its full potential thereby contributing to the economic growth of the Region. It highlights that a robust policy framework is required in order for DSG to deliver the infrastructure in a timely manner and this can be achieved by the inclusion of specific policy that would support the future development of Greenore Port in the forthcoming RSES.

We would welcome the opportunity to meet with the Assembly to deliver a brief presentation of DSG's Masterplan and look forward to working with you in the future.

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