

Dublin Port Post 2040 Dialogue – Paper 4

AN OVERVIEW OF THE CALLS TO MOVE DUBLIN PORT

28th September 2020

There has been no shortage of grandiose suggestions over the past fifty years as to how Dublin Port should be developed. Starting in the 1960s, the port authority (Dublin Port and Docks Board) put forward expansion plans which led to considerable public opposition¹. This put a strain on the relationship between the Port and the City to the extent that subsequent ideas about greatly reducing the scale of port operations or moving the port entirely emerged over the 30 years from 1990.

These ideas included:

- ESB International's 1990 study *Port Infrastructure in Ireland – Requirements and Proposals*
- The Progressive Democrat's 2006 proposal *A New Heart for Dublin*
- Dublin City Council's 2007 *A Vision for Dublin Bay*
- The Irish Academy of Engineering's 2018 *Brexit: Implications for Transport Infrastructure Investment*

None of these four proposals considered the scale or feasibility of what they suggested in any level of detail and the idea of moving Dublin Port periodically reappears, presented as an inevitability, oblivious to the realities or consequences of what is proposed.

A Vision for Dublin in 2050, Dublin Chamber of Commerce, 2017



¹ 1965: <https://www.rte.ie/archives/2020/0416/1130897-dublin-port-and-docks/>
1972: <https://www.rte.ie/archives/2017/0718/891167-dublin-bay-development/>

For example, in 2017 the Dublin Chamber of Commerce produced a video² showing *A Vision for Dublin in 2050*. The video includes a flyover of the city of the future coming in along the Liffey and over an imagined landscape not altogether unlike a *Blade Runner* cityscape. The accompanying 48 page document contains not a single mention of how the port infrastructure required to meet the needs of the Dublin of the future would be provided.

It is ironic that the conditions where the realities of Dublin's port infrastructure requirements could be so blithely overlooked were created by Dublin Port and Docks Board itself and it is instructive to look at how this happened.

In the mid-1960s, Dublin Port and Docks Board suggested that the long-term development of Dublin Port might include an enormous infill of Dublin Bay. This infill would create 800 hectares of made ground for port activities and a further 400 hectares for housing. On the north side of the port, much of the Tolka Estuary would have been infilled. To the south, a new bend of bay would have been created by a huge infill from the Poolbeg Lighthouse all the way to Blackrock.

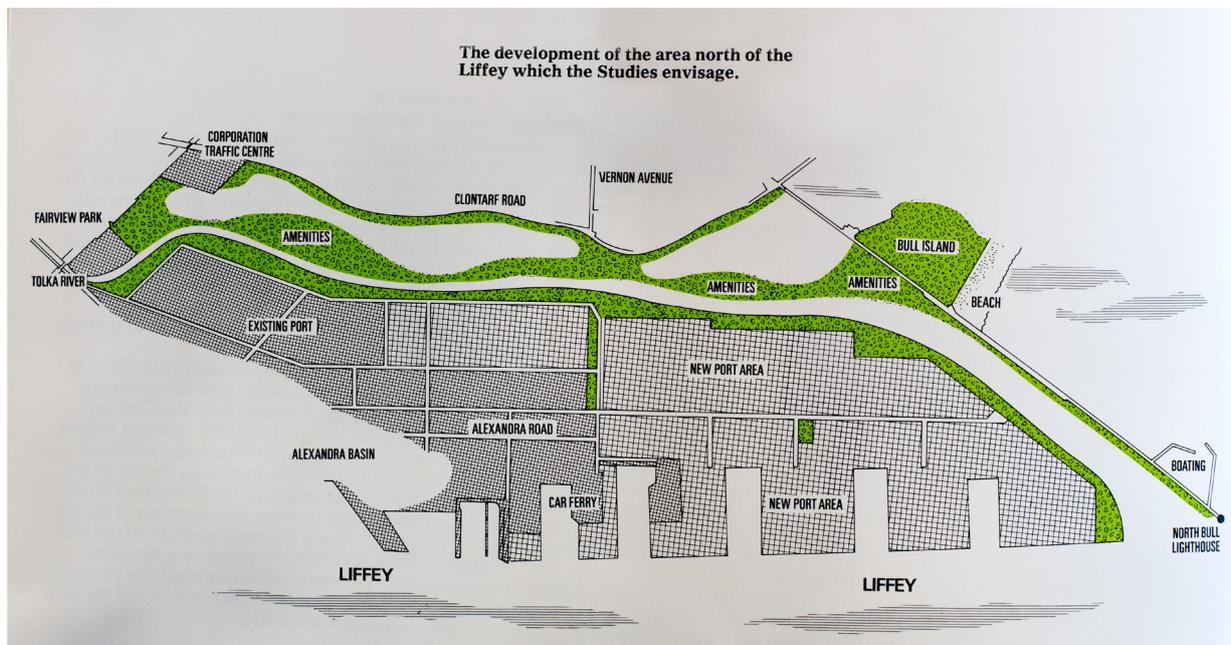
This vision was included as ... *the ultimate overall development which might take place catering for port industries, housing and amenities* in a 1972 publication by Dublin Port and Docks Board entitled *Studies in long term development of the Port of Dublin*. These studies were undertaken in conjunction with third parties, including planners from Rotterdam, a former Chief Traffic Advisor from the British Ministry of Transport, an Irish landscape architect and an ESRI economist.

Given the opposition that already existed in 1972 to the idea of infilling Dublin Bay, the presentation of the port board's ideas was defensive right from the opening words of the Introduction to the study report:

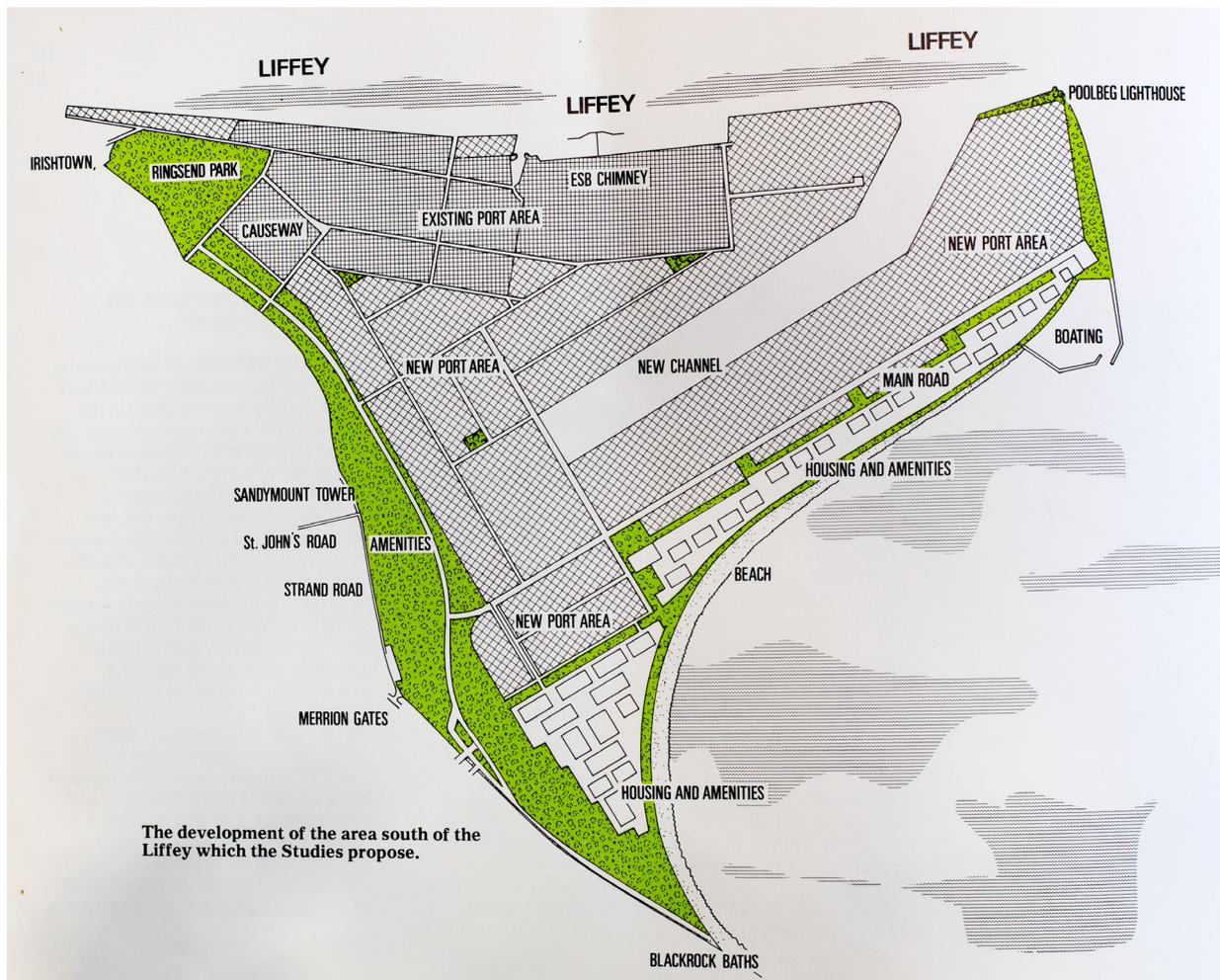
It is unusual in a document such as this to refer in any great detail to the anticipated public reaction to the proposals which it contains.

However, the situation is significantly different in that the public has been aware for some years of general proposals for long term developments at Dublin Port following the publication by Dublin Port and Docks Board in November 1965 of an outline sketch.

Dublin Port and Docks Board vision for the ultimate development of Dublin Port north of the Liffey, 1972



² <https://youtu.be/8GrJQWqI85Q>



Dublin Port and Docks Board vision for the ultimate development of Dublin Port south of the Liffey, 1972

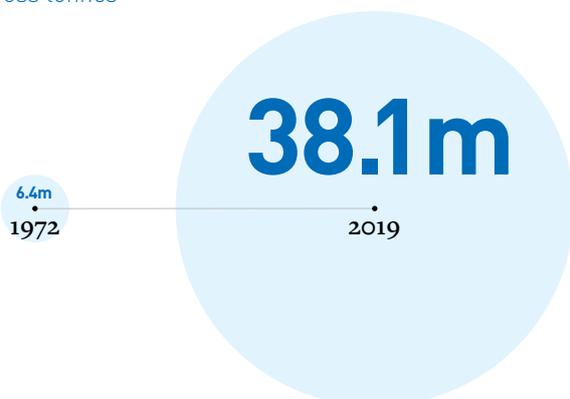
A few paragraphs later, the Introduction says:

There is, unfortunately a line of criticism which tends to claim that everything the Board proposes is wrong and that therefore everything in the long term development proposals may be wrong. It would be most unfortunate if in the process of a 'right or wrong the Board is wrong' approach, these critics lost sight of the fact that they are in a position to influence the final shape of long term developments by a thoughtful, probing examination of all the factors involved.

The scale of the controversial vision was enormous by any standard. The total additional 1,200 hectares of made land suggested in 1972 compares to the creation of 1,000 hectares of made land in the Port of Rotterdam's Maasvlakte 2 development which was completed in 2012.

The volume of cargo passing through Dublin Port's 260 hectares has increased sixfold since 1972

Gross tonnes



To put these figures into perspective, Dublin Port's land area today is 260 hectares. In 1972, the port's throughput was 6.4 million gross tonnes. In 2019, it was 38.1 million gross tonnes. Over the intervening 47 years when the suggested quadrupling of the Port's land area would presumably have taken place, the cargo throughput on the same 260 hectares has increased sixfold.

In retrospect, it is clear that the thinking behind *Studies in long term development of the Port of Dublin* could not have foreseen the impact of containerisation or the transition away from coal to energy sources (such as gas and renewables) which did not require port facilities. Although the approach of the port board was the same approach that had so successfully developed Dublin Port over the previous 250 years, it was outdated. In the 1960s and 1970s, public scrutiny and environmental impact assessment of large infrastructural projects was becoming the norm.

The thinking in Dublin Port and Docks Board in 1972 was old thinking and the idea of hugely infilling Dublin Bay was, at that stage, already 56 years old.

In 1914, the Dublin Civics Institute organised a competition for a *Plan for Dublin* which attracted eight entries. The winning entry by Arthur Kelly, Patrick Abercrombie and Sidney A. Kelly was published in 1916.

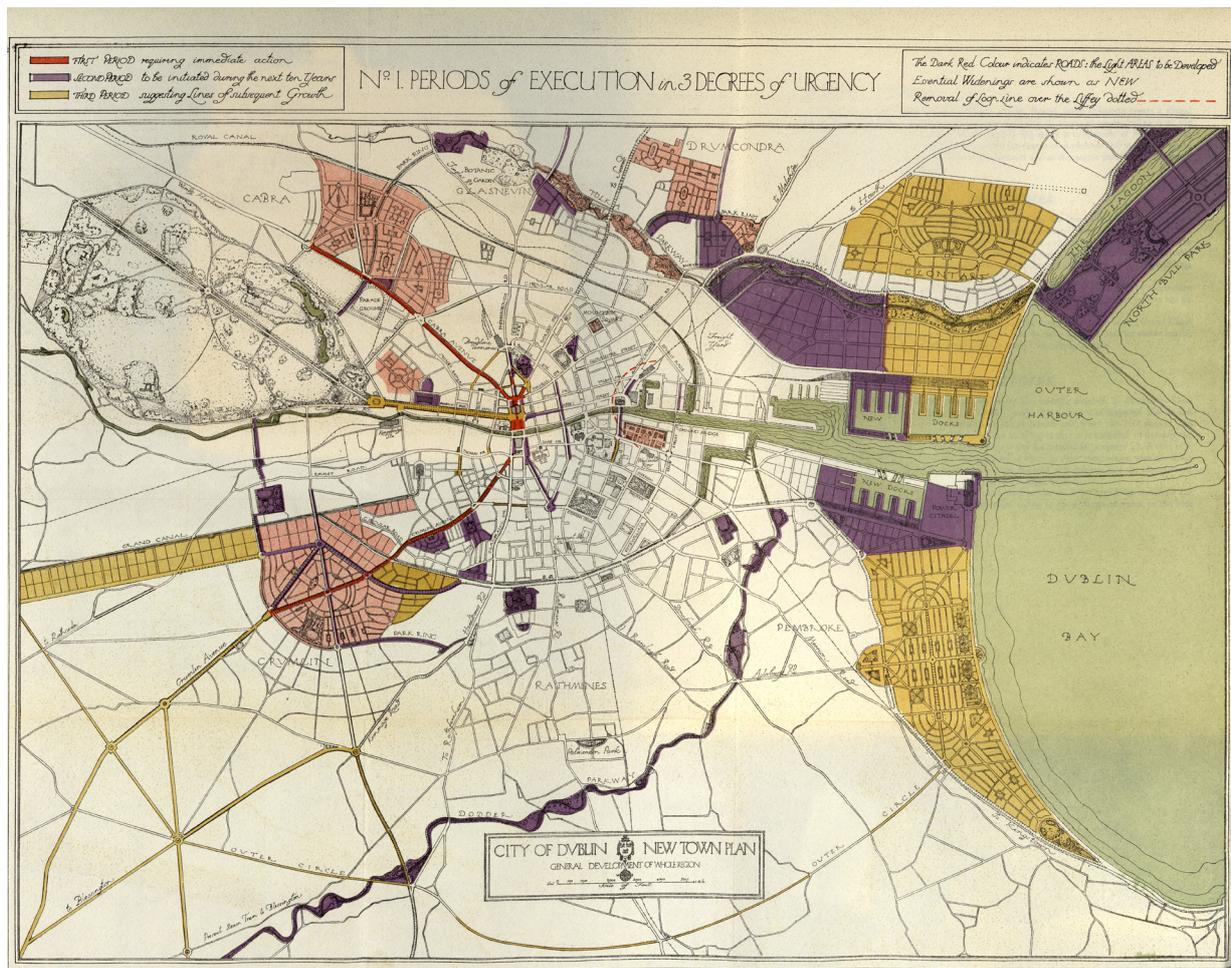
Abercrombie was an influential town planner in England and was one of the authors of London City Council's *County of London Plan* for the post-war reconstruction of London. Abercrombie's plans for London were very much in the vein of the garden city approach of Ebenezer Howard in the early decades of the twentieth century where industrial and residential areas would be separated rather than being mixed together in overcrowded towns and cities.

In the *New Town Plan* for Dublin, huge infill was envisaged both to the north of the port but, particularly, in the southern bay, almost as far as Dun Laoghaire, to provide 825 hectares for port and industrial activities and 400 hectares for housing. The 1,250 hectares in the *New Town Plan* of 1916 is almost the same as the 1,200 hectares suggested by Dublin Port and Docks Board in 1965. Whereas Abercrombie's suggestion to infill Dublin Bay to provide land for housing is still cited as an exemplar of what we should do today, less attention is given to the much larger provision the suggested infill made for port and industrial purposes.

Abercrombie's *New Town Plan* highlighted the need for planning legislation. This was eventually introduced in 1934 and, for its part, Dublin Corporation appointed a team of consultants (which included Abercrombie) to prepare plans for the layout and development of Dublin. The *Dublin Sketch Plan* of 1939 resulted and it again envisaged extensive infill into Dublin Bay.

Against this background, the infill suggested by Dublin Port and Docks Board in 1972 does not seem so misguided, however controversial it proved to be. Old ideas and orthodoxies have a tendency to prevail long past their sell by dates and sometimes old ideas reappear as solutions to contemporary challenges.

There was no shortage of plans and ideas in the early 1970s about how Dublin might be developed. This was the era of national economic planning inspired by T.K. Whittaker. The port board published its studies during the four year term of the *Third Economic Programme for Economic and Social Development* from 1969 to 1972 which set ambitious targets for industrial growth and for exports.



New Town Plan for Dublin suggested by Patrick Abercrombie, 1916

In terms of spatial planning, there were new ideas about how Dublin City and Dublin Port should be developed. Most notably, Myles Wright, a planner from Liverpool, prepared a *Plan for the Dublin Region* in 1967 and, in this, he sought to limit expansion of the port by infill and called for a public inquiry into the future expansion of the port. At the same time, Wright suggested the development of four new towns to the west of Dublin with green belt separation following the garden city approach of Ebenezer Howard. Where Abercrombie had ignored greenfield lands to the west and suggested expanding the city into Dublin Bay in 1916, Myles Wright proposed the opposite in 1967.

In fairness to Dublin Port and Docks Board, the studies it published in 1972 sought, for the first time, to place port development projects into a coherent long-term framework:

Hitherto, Port development has taken place as it was required but without a concept of ultimate or overall development.

Whereas the port board's plans ran into public opposition and influential planners opposed further infill, the idea of moving the port had not yet become current and, in the RIAI's 1975 publication, *Dublin – a city in crisis*, the architects even recognised that:

Having a port function one block away from the city's main street is a most unusual situation which lends a great deal of interest, with the colour and movement of shipping.

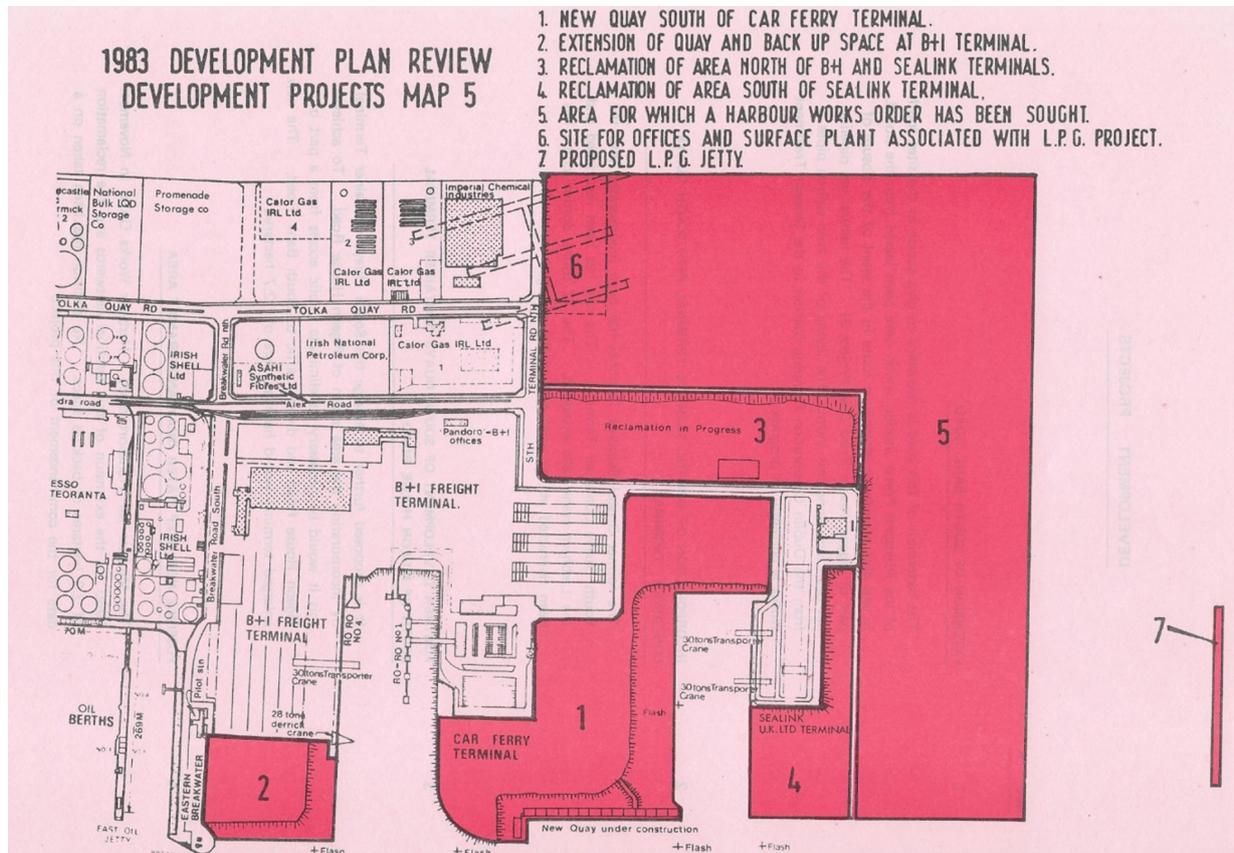
Having said this, the RIAI shared Wright's concern for Dublin Bay and, in one of its 19 recommendations, said:

The shoreline and the bay, part natural and part man-made, is a special and precious asset. It must be conserved and protected. First priorities here include the preservation and improvement of public access for recreation; the control of unsuitable, intrusive or incongruous development, particularly by industry; a total re-appraisal of the proposed coastal motorway; and the proper control and integration of port and harbour development with the city's traffic network and the overall planning and design of the bay as a whole.

Dublin Port and Docks Board's attempt to put long-term structure on the port's development plans was made at the same time as overarching plans for national economic development and for the spatial development of Dublin were being implemented. Given that the development options for Dublin Port were very much a continuation of past practice over decades, if not centuries, it is not surprising that the Dublin Port and Docks Board got it so badly wrong. Unfortunately, the port board compounded its own difficulties in the following years with at least three more controversial development proposals, none of which ever proceeded and all of which weakened the port's connection to the city it served.

Firstly, between 1972 and 1976, a developer applied for planning permission for an oil refinery on an 80 hectare infill extension to the Poolbeg Peninsula. The refinery was to have a similar capacity to Whitegate. The proposed development was very contentious and Dublin Port and Docks Board took what seems today to have been a jesuitically neutral stance on the issue. Permission for the development was ultimately refused by the Minister for Local Government.

Dublin Port and Docks Board Development Plan, 1983



Secondly, Dublin Port and Docks Board was more directly exposed to criticism for its support of a 1981 proposal to build underground gas caverns to store 100,000 tonnes of LPG. The project was included within the port's development plan for a number of years.

The proposed caverns are shown as Item 6 in the port development plan for 1983. They would have been partially beneath the existing Calor Gas facility in Dublin Port and partially beneath 38 hectares of new made ground which the port board proposed to create by infill (Item 5). The infill proposal was first made in 1979 when the port board applied for a Harbours Works Order. The caverns were to be filled by unloading tankers at a new jetty in a north-south orientation to the east of the port (Item 7). Dublin Corporation granted permission for the gas caverns development in 1982 but An Bord Pleanála overturned this on appeal in 1984.

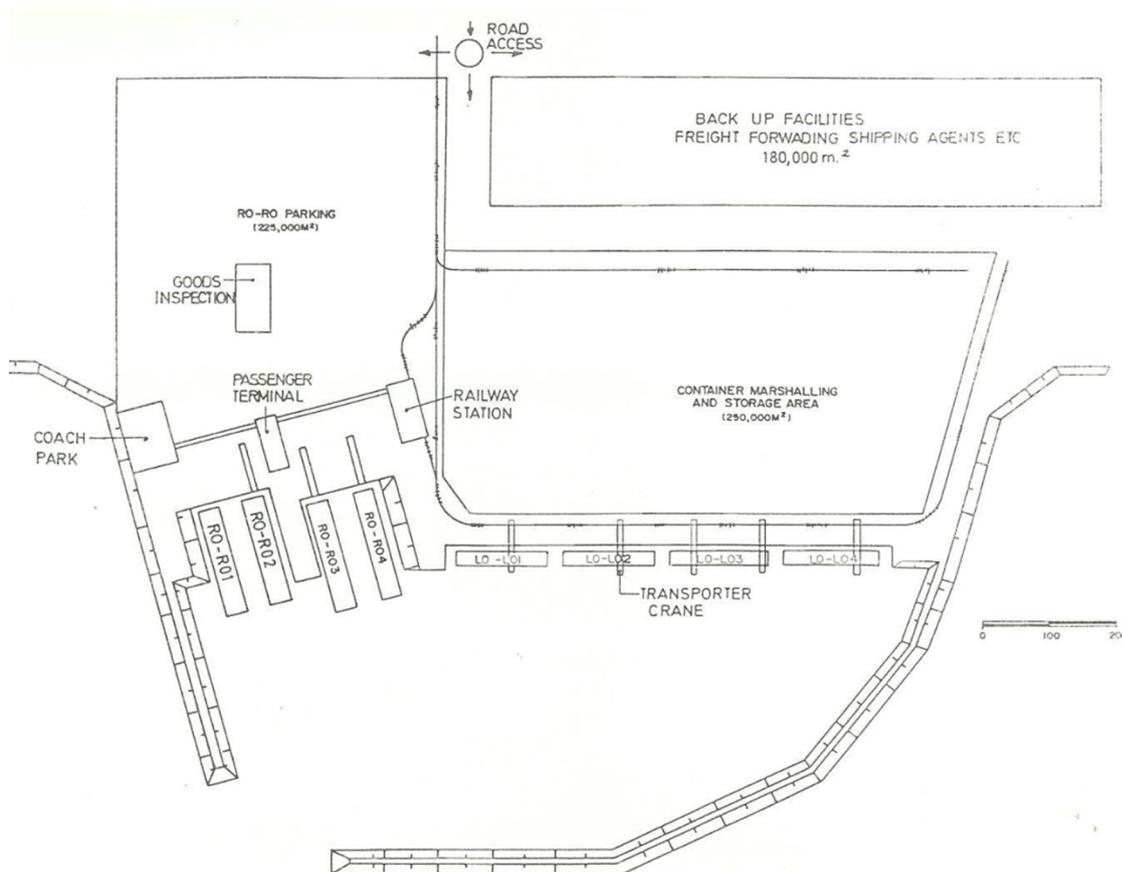
The third failed and controversial development was a smaller version of the original 38 hectare infill proposal. This was the Dublin Gateway project and it proposed

a 21 hectare infill to the east of the port with greater distance between it and Clontarf than the original 38 hectare proposal would have given. This smaller infill project was just as vigorously opposed and was ultimately refused planning permission by An Bord Pleanála in 2010.

At a time when the port board's development plans were so out of kilter with the development plans for the city and with public sentiment, the first proposal to move activities from Dublin Port to a new port to be built elsewhere on the east coast emerged in 1990 when ESB International published *Port Infrastructure in Ireland – Requirements and Proposals*.

In its report, ESBI concluded that *It was technically feasible to establish a single port capable of handling all present and projected needs for Ro-Ro and Lo-Lo shipping, on the Central Irish Sea Corridor, at a suitable North County Dublin location.* The location at which this new port could be built was limited to the section of coast between Malahide and Balbriggan, specifically at Loughshinney.

Layout of ESBI's suggested new port at Loughshinney, 1990



ESBI's new port would have been a harbour enclosed by approximately 2,000 metres of breakwaters. There would have been a container terminal (with a quay wall 650 metres long and 25 hectares of land) and a Ro-Ro ferry terminal (with four berths and 22.5 hectares of land).

Given the scale of ESBI's assertion that the new port at Loughshinney could have handled the *present and projected needs for Ro-Ro and Lo-Lo shipping*, the illustrative facility they proposed was unrealistically small. For example, the breakwaters would have been shorter than the piers in Dun Laoghaire Harbour (2,800 metres) and a small fraction of the size of Dublin Port's sea walls (7,500 metres). Moreover, the 650 metres of proposed quay wall for Lo-Lo operations compares to the almost 1,600 metres aggregate length of the quay walls in Dublin Port's three container terminals today. Finally, where ESBI's report suggested the need for four Ro-Ro berths at Loughshinney, there are eight Ro-Ro berths in Dublin Port today with more under construction.

The report suggested that the new port could have been constructed at a cost of €200m (at 1989 prices) and could have been completed within three to four years of approval, including planning approval.

The cost justification for proceeding with this proposed expenditure was that it was cheaper than the combined costs of Dublin Corporation's then proposed Port Relief Road - the Eastern Bypass by another name - of €317m and the cost of development proposals in Dublin Port and Dun Laoghaire Harbour of €50m.

Beyond cost, the report said that:

...the proposed new port would facilitate the redevelopment of complete areas of the city which are effectively derelict at present, due to the combination of port storage and port related traffic problems. In particular, it would facilitate mixed commercial, residential and light industrial development on the north and south docks area and the Liffey quays area, thus transforming the area.

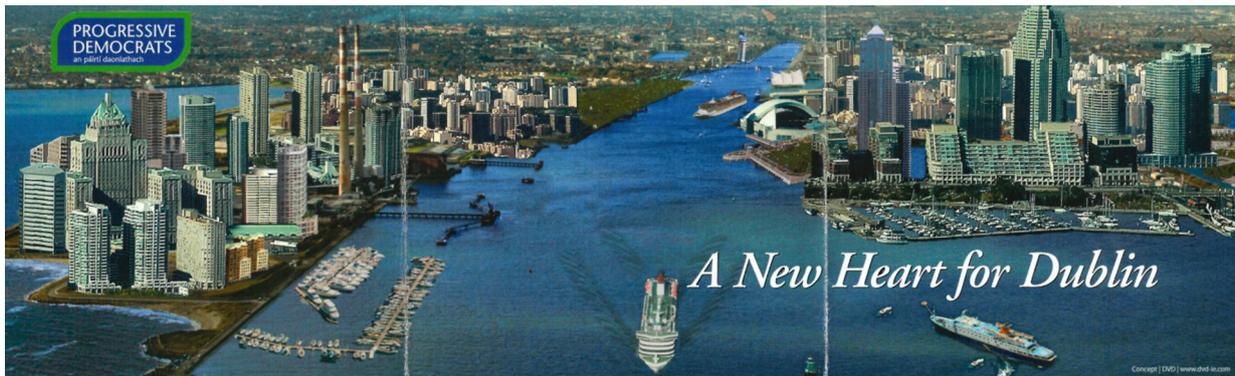
Quoting from Dublin Port and Docks Board's 1988 Development Plan (in which the port authority identified that development to provide capacity for growth to the turn of the century would require the continued eastward expansion of the port), ESBI, somewhat caustically, said:

But while Dublin Port and Docks Board recognise the problem, there is no indication that they appreciate the critical dimensions of the problem in an increasingly environmentally aware society.

It is difficult to disagree with this assertion by ESBI. However, while saying this, ESBI did not itself show much awareness of the environmental and planning challenges a new port at Loughshinney would have had to overcome. At the time the ESBI report was published, Dublin Port and Docks Board's proposed eastern extension by infill had already been under consideration for 21 years and, yet, ESBI felt that it would be possible to complete construction of a new port at a greenfield site *within three to four years of approval, including planning approval.*

It is a common feature of all of the proposals to build alternative port facilities elsewhere on the east coast that the environmental and planning challenges which these megaprojects would have to overcome are ignored. Somehow, the constraints that apply to developments in Dublin Port wouldn't be as onerous for even larger developments elsewhere.

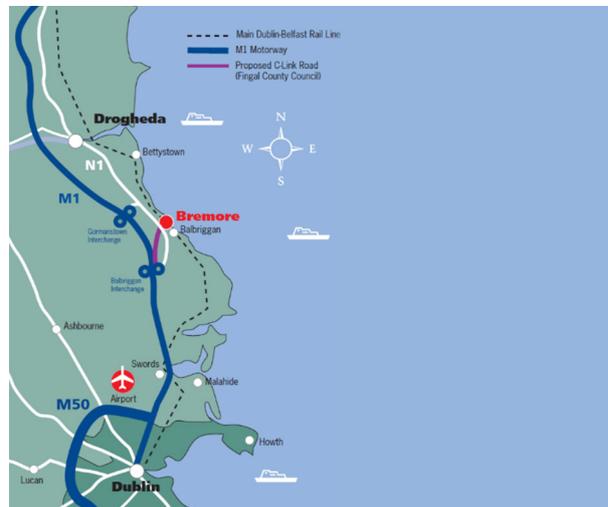
Sixteen years after ESBI published its study report, the Progressive Democrats produced an even more ambitious variant of the Loughshinney proposal in 2006. At the time, the PDs were a party of Government and their suggestion carried more weight than ESBI's had. Where ESBI had suggested moving Dublin Port's Ro-Ro and Lo-Lo business to Loughshinney, the PD's *A New Heart for Dublin* proposed moving Dublin Port to Bremore, near Balbriggan, and redeveloping the lands of Dublin Port to produce a Manhattanesque skyline not very different to that subsequently imagined in 2017 by Dublin Chamber of Commerce in its 2050 vision for the city.



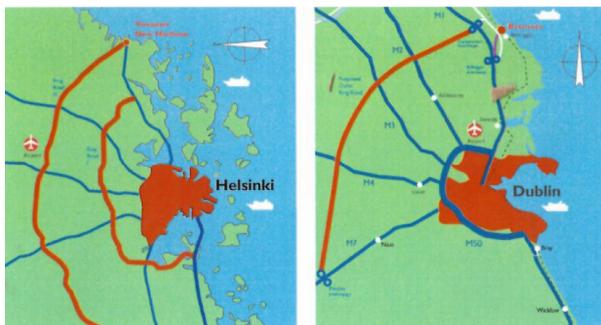
Progressive Democrats' proposed development of Dublin Port, 2006

The need identified for moving *Dublin Port* was that *Dublin City* is suffering from the modern malaise of the deterioration of its environment and of the quality of life of its one million plus citizens. In addition, the port was restricted by the encroaching city and citizens... are concerned with the ports eastward expansion plans into the 52 acres.

In 2004, two years before the PD proposal, Drogheda Port Company had proposed to build a new port at Bremore, near Balbriggan. The PDs compared Bremore's location in relation to Dublin with that of Vuosaari in relation to Helsinki and concluded that what had been done in Helsinki by way of moving port activities away from the city should similarly be done in Dublin.



Drogheda Port Company's illustration of the proposed Bremore Port in relation to Dublin City, 2004

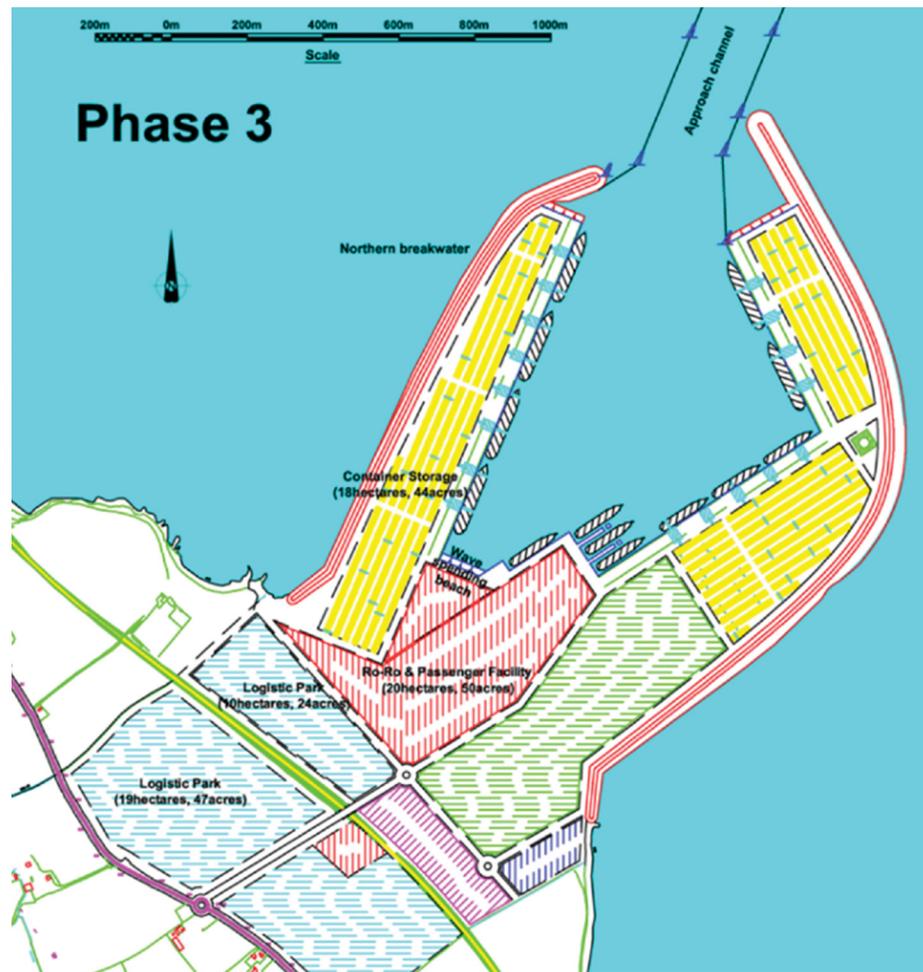


Progressive Democrats' comparison of Helsinki and Dublin, 2006

That the PD proposal cited Vuosaari as an exemplar for Dublin was not surprising as the Drogheda Port Company proposal for Bremore had itself cited Vuosaari and had similarly shown Bremore in relation to Dublin to make its point.

While the logic was superficially attractive, there were notable differences between the situations in Dublin and Helsinki. Most obviously, the PD's attractive imagery suggested that 34 hectares of tank farms in Dublin Port (through which almost one-third of the country's entire energy requirements are imported), three power stations (responsible for about one-fifth of all electricity generated on the island of Ireland) and the largest waste water treatment facility for County Dublin would all be relocated.

Drogheda Port Company's vision for the ultimate development of Bremore Port, 2004



However, Drogheda Port Company's plan for Bremore only envisaged the development of cargo handling facilities for Ro-Ro and Lo-Lo trade and made no mention of other cargo modes let alone of port-based critical national infrastructure.

Moreover, neither the PD proposal nor the earlier Drogheda Port Company proposal it was based on recognised that the challenge of a greenfield development at Bremore was not directly comparable to the brownfield development at the redundant shipyard at Vuosaari.

In addition to the planning and environmental challenges of building a new port, there was the issue of cost and the PD proposal provided no estimate on the level of cost to build the new replacement port at Bremore. However, the proposal did memorably state that *At up to €50m per acre, Dublin Port's land bank of 660 acres could release between €25 billion and €30 billion at 2005 prices.*

The lower estimate suggested an average value of land in Dublin Port of €38m per acre. By comparison, the ill-fated Irish Glass Bottle lands sold for €17m an acre in 2006. Even then, at the height of the property bubble, €17m an acre was an extraordinarily high price for development land not only by Dublin standards but by world standards. And yet, this price was less than half of what it was asserted port lands could be sold for if port activities were moved to Bremore.

The current value of the IGB lands is not much more than about €4m per acre, a small fraction of the suggested value of €38m 14 years ago.

Drogheda Port Company's proposed new port at Bremore was to be developed in three phases to ultimately create a harbour enclosed by two breakwaters with an aggregate length of 3,800 metres. The total land area of the new port was 200 hectares including 90 hectares of land made by infill. As in the case of ESBI's Loughshinney proposal,

there would be four Ro-Ro berths. However, Bremore was envisaged to have up to 3,800 metres of quay walls for Lo-Lo container handling.

The PD proposal was entirely unrealistic in many respects. At the most fundamental level, Bremore Port, as proposed, would have had nowhere near sufficient capacity to cater for Dublin Port’s cargo volume and a far bigger port would have had to be built. Drogheda Port Company’s plan at Bremore was to build a port with an estimated capacity of 20 million tonnes plus.

It is now 16 years since Bremore was first suggested and it is nowhere nearer being built today than it was in 2004. In the intervening 16 years, the increase alone in Dublin Port’s throughput has been 15 million gross tonnes equivalent to nearly three quarters of the ultimate capacity proposed by Drogheda Port Company at Bremore.

As in the case of Loughshinney, the shortcomings and perceived problems with Dublin Port in its current location did not give rise to an alternative approach which could have gone anywhere near addressing these shortcomings and problems. Where ESBI had at least

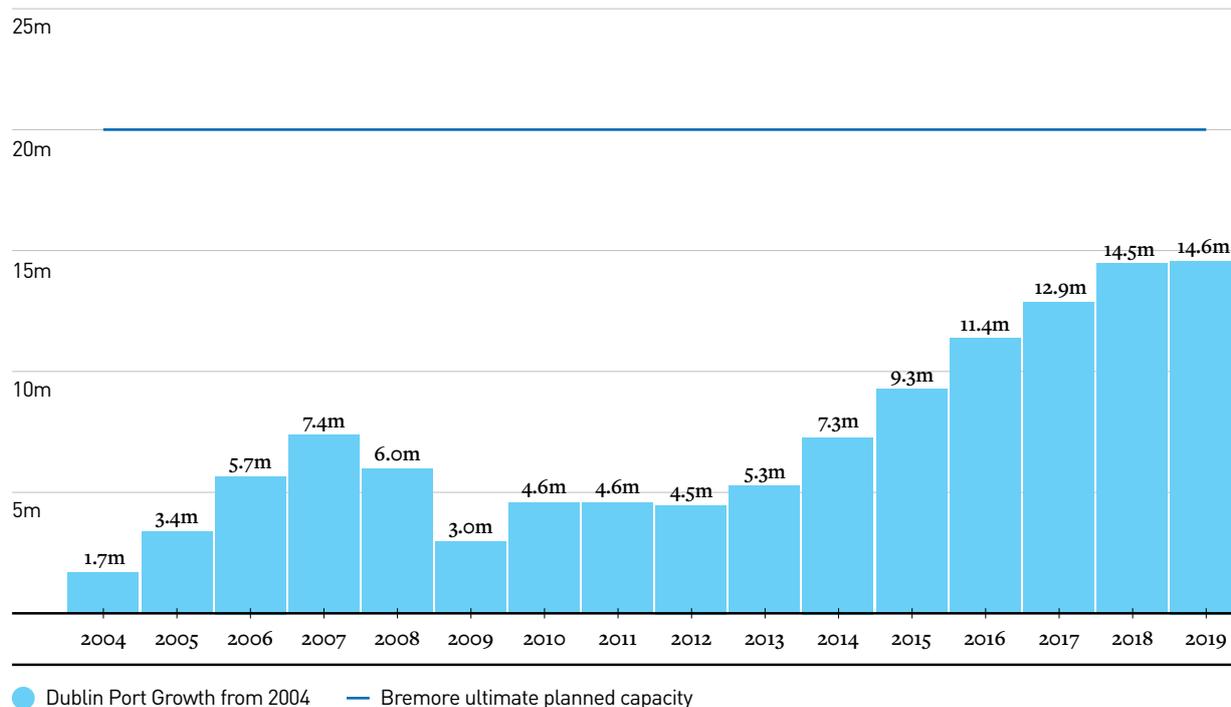
attempted to put a cost estimate on their proposal, the PDs simply asserted that the value of Dublin Port’s lands was so extravagantly large that selling them for redevelopment would yield vast sums greatly in excess of what would be needed to build a new alternative port, however much that might cost.

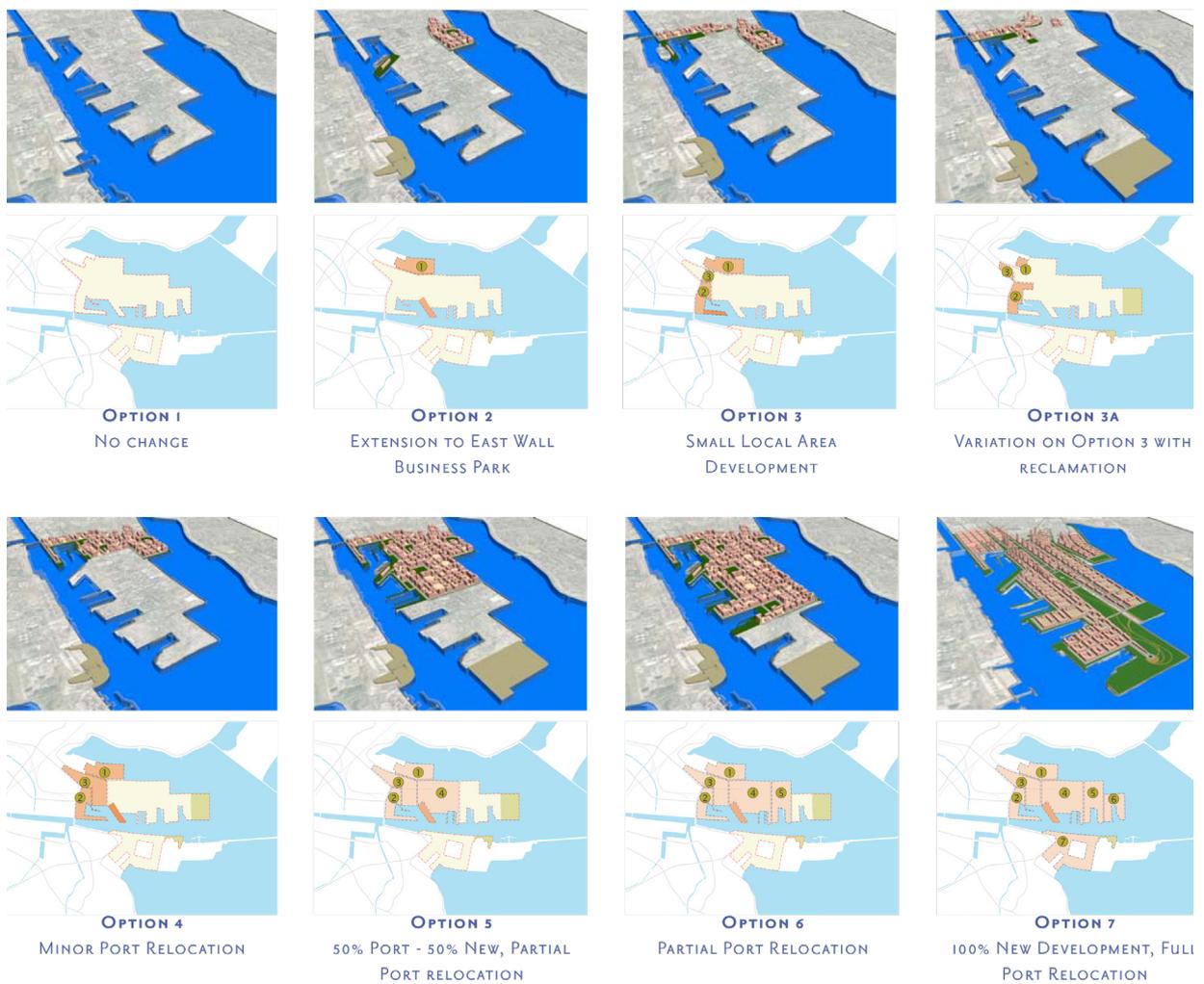
Notwithstanding how challenging the development of a new port at Bremore would have been for Drogheda Port Company, the project was facilitated at a policy level by ministerial approval for Drogheda Port Company to enter into a joint venture agreement. In addition, the port company’s statutory limits were extended to include Bremore. This was an important consideration in terms of providing powers of compulsory purchase to the port company for its project, were it ever to get off the ground.

Whereas the PD proposal was to relocate Dublin Port to Bremore, the possible development at Bremore was, intended, in policy terms, to provide additional port capacity and, in the words of the Minister at that time,

Cumulative increase in Dublin Port’s throughput since 2004

Gross tonnes





Options for Dublin Port considered in Dublin City Council's *A Vision for Dublin Bay, 2007*

... to promote competition while relieving congestion at Dublin Port. This proposal is being advanced as a standalone project and is not dependent on, or linked to, any relocation of capacity from Dublin Port.

A joint venture development company was formed between Drogheda Port Company and a subsidiary of Treasury Holdings. However, to this day nothing of any substance has happened to progress with the Bremore project – for a host of very obvious reasons.

The idea of moving Dublin Port was given added currency during the boom period when, in 2007, Dublin City Council published *A Vision for Dublin Bay*. This report

was the outcome of a study undertaken as part of the city council's earlier ten year strategy (2002 to 2012) *Dublin – A City of Possibilities*. By comparison with the earlier ESBI and PD suggestions, DCC's approach was not didactic and was designed to prompt discussion. It recognised the need for further analysis and detailed planning.

The 2002 strategy had stated that

Imagination is what is required if we want to be forward thinking and are to truly create new and exciting possibilities.



Dublin City Council's *A Vision for Dublin Bay*, 2007



Dublin Port Company's illustration of the scale of Dublin Port if relocated to Bremore, 2007

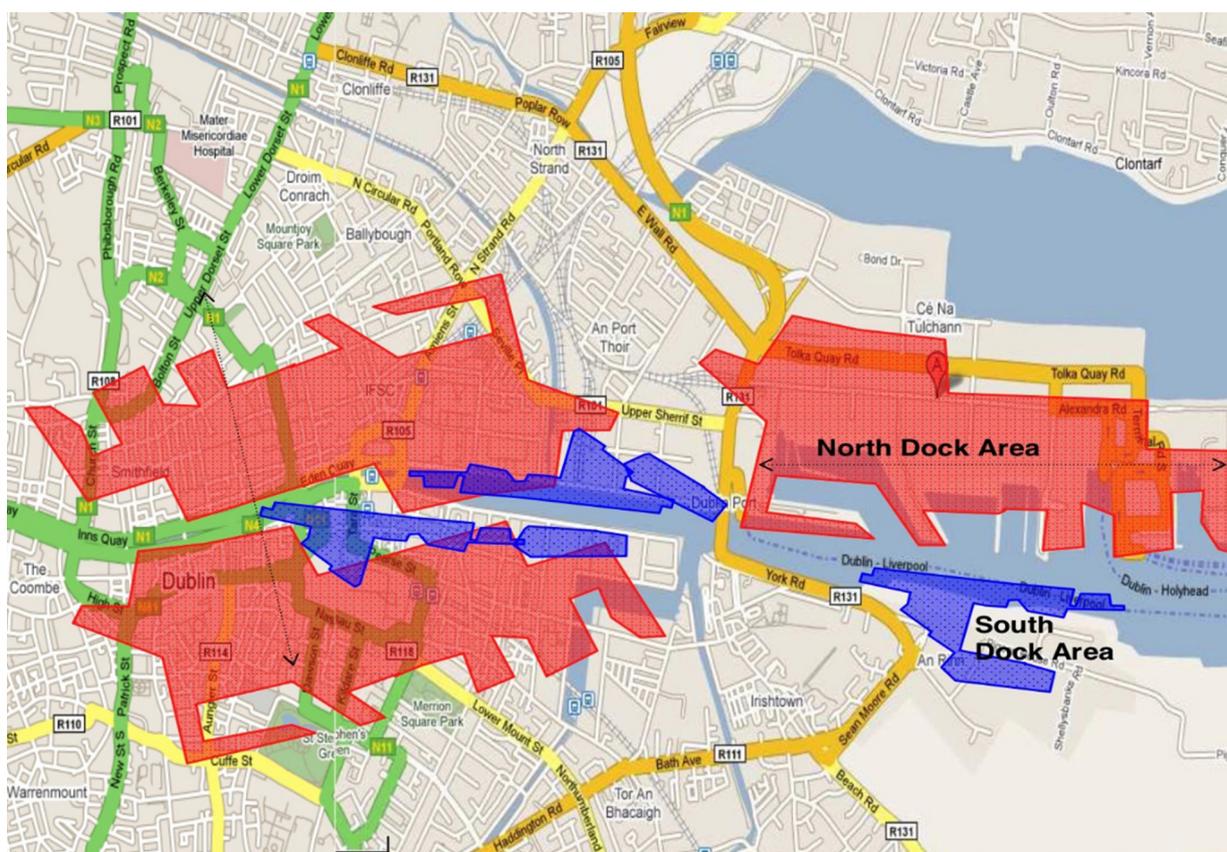


Illustration of the scale of the challenge to redevelop the lands of Dublin Port, Indecon Study, 2009

In this spirit, the 2007 report described itself in the following terms:

It is, simply, a blueprint for Dublin Bay, a first step towards a detailed master plan to protect its heritage, to enhance its vitality, and to assure its sustainable use.

It is a reflection of dialogue with many stakeholders representing an array of public and private interests. It is the result of multidisciplinary analyses of possible “alternative futures”.

A *Vision for Dublin Bay* considered eight options based on removing different levels of cargo handling from Dublin Port to an unspecified alternative location. The study made no reference of Loughshinney, Bremore or any other location. Nor did it look at the cost, environmental constraints or planning challenges that might be required to realise any of the eight options.

Because it focussed on identifying the most attractive alternative future without considering how this might be achieved, it is unsurprising that the study favoured the full port relocation option and the visual representation of this option was certainly eye-catching.

For its part, Dublin Port Company had highlighted the huge challenge needed to realise the preferred option in *A Vision for Dublin Bay*, namely the construction of an alternative port on a similar scale to Dublin Port, and illustrated this by superimposing an outline of Dublin Port onto Bremore Head and contrasting this with the footprint of Balbriggan.

There were both differences and similarities between DCC's vision for Dublin Port and the PD's proposal. Where the PDs had shown the entire Poolbeg Peninsula being redeveloped, *A Vision for Dublin Bay* recognised the need to retain critical infrastructure on the Poolbeg Peninsula. On the other hand both DCC and the PDs envisaged the retention of cruise ship activities in Dublin Port. In DCC's case, a vestigial port facility would be retained for cruise ships with the balance of 260 hectares of port lands being redeveloped to provide 28,000 housing units, 1.2 million square metres of office space and 0.3 million square metres of retail space.

The DCC study did not stand alone and it was part of a wider consideration of national development plans at the time. In particular, the *National Development Plan (2007-2013)* identified the need:

...to undertake a comprehensive study of the role of Dublin Port, taking account of locational considerations, in the context of overall ports policy on the island of Ireland, wider transport policy, urban development policy, the National Spatial Strategy and national economic policy. This review will take account of the findings of the study on the role of Dublin Bay and the Dublin Port Area commissioned by Dublin City Council.

In July 2009, the *Dublin Port National Development Plan Study Report* was published. It had been prepared for the Department of Transport by Indecon in association with MDS, Jones Lang LaSalle and Adams Hendry Consultants.

In the terms of reference, the consultants were asked to examine the costs and benefits of various scenarios relating to Dublin Port, including:

- Relocating all or part of Dublin Port's existing activities to an alternative location(s);
- Existing port activities continuing to expand with demand; and
- Port activities continuing at current levels with growth being catered for at alternative locations.

The suggestion of moving Dublin Port to Bremore was at the core of the study's considerations and is reflected in the study report's conclusion:

The key findings of this study indicate that additional port capacity will be required in Ireland and it is likely that this would require the expansion of Dublin Port or the proposed development of Bremore or an equivalent alternative. Given the uncertainty concerning both these projects, nothing should be done at a policy level to block these projects at this stage, as there is a significant cost for Ireland if neither of these projects develop. Our analysis also indicates that the closure of Dublin Port is not justified on economic grounds as the benefits of alternative land use is less than envisaged and that these and other benefits would not justify the costs involved.

In its report, the consultants gave a useful visual representation of the scale of the challenge to redevelop the vacated lands of Dublin Port by superimposing outlines of the land areas of Dublin Port on the north side and on the south side of the Liffey onto a plan of the city. This was done to support the study's statement that:

To fully develop these lands at an urban scale through many upward and downward property cycles, would in our view be a project of centuries. This is based on our assessment of the annual incremental demand in Dublin for residential and commercial property and our view of how long it would take for the market to absorb different parcels of land based on these factors.

The Indecon study was decisive and clear in its conclusions. While not ruling out the development of new additional port facilities at Bremore, the study firmly identified that there was no economic rationale to consider moving Dublin Port to another location.

From Dublin Port Company's perspective, this seemed to be an entirely logical conclusion in line with the port company's understanding of and appreciation for the huge challenges and enormous expense to build a replacement port.

However, where there was some possibility that the State might undertake just such a challenge, there was no shortage of support from sectors that would benefit from it. This is particularly well illustrated by a breathless

opinion piece written by an executive in one of Dublin's leading property agencies and published in the Irish Times in March 2008 as the country was sliding into a deep recession.

Opinion piece by a property agency executive, Irish Times, 21st March 2008

The 650 acres of prime development land that makes up Dublin Port is significantly undervalued in its current use and the Government can no longer ignore its potential.

DUBLIN PORT IS undoubtedly one of Ireland's most valuable pieces of real estate, involving approximately 263 hectares (650 acres) of prime development land that is significantly undervalued in its current use. The potential of the port cannot be overstated and can no longer be ignored.

It is anticipated that Dublin Port will have reached operational capacity by 2008. This leaves the Government with mainly two possible options: reclamation of some 21 hectares (52 acres) amounting to 0.04 per cent of Dublin Bay; or relocate the port.

Reclaiming the land may give rise to a number of damaging issues, such as increasing the risk of flooding in city centre areas and ecological threats. Furthermore, this option can only be seen as a short term solution to a long term problem.

Should the Government choose to relocate the port, they would be freeing up one of its high net value assets. Relocating the port and releasing up to 650 acres of city centre lands may enable rezoning to mixed uses. Under the Dublin City Development Plan 2005-2011 the majority of the port lands are zoned "Objective Z7", providing for mainly industrial use.

On appraising the potential relocation of the port, you would have to take into account the significant potential that Bremore Port has to offer. Located just north of Balbriggan, Bremore is a deep water port with room for expansion as it has an existing land bank of up to 1,000 acres.

Castle Market Holdings, a subsidiary of Treasury Holdings, was successfully selected by Drogheda Port as partners for a joint venture that will see Bremore transformed into a modern state-of-the-art deepwater facility. Drogheda Port will control a 51 per cent stake in the development while Castle Market Holdings will hold the remaining 49 per cent.

Bremore appears to tick all the boxes as a suitable relocation for facilities at Dublin Port with the process of preparing a port masterplan for Bremore already underway with Bremore expected to be fully operational by 2012.

In September 2007, Dublin City Council carried out a study - Dublin Bay - An Integrated Economic Cultural and Social Vision for Sustainable Development - which is seen as the initial step in preparing a strategic framework plan for the Dublin Bay area, including Dublin Port.

The study identifies seven options for Dublin Port which can be narrowed down to four and sorted into three realistic scenarios.

The first scenario is to re-develop about 51 hectares (126 acres) of the port lands, to accommodate at least 12,000 residents.

The second is to re-develop about 50 per cent of port lands, to accommodate about 32,000 residents. The final option is to re-develop and relocate the entire port to create accommodation for about 55,000 people.

Opting to relocate the port would undoubtedly be met with stiff opposition as about 10,000 people work in and around the port, and relocating the port would require significant capital expenditure on the upgrade of infrastructure in the new location. Further difficulties may also be faced in securing planning permission in the chosen location.

Having said that, relocating port facilities would allow for strategic and proactive planning, to enable the successful development of modern purpose-built facilities to cater for future needs.

Also, the direct effects that accompany construction work is somewhat lower when choosing to relocate rather than upgrade existing facilities.

Upgrading existing facilities would have considerable impact on the day-to-day lives of locals and workers in the area, with a problem of increased traffic.

Under the National Development Plan 2007-2013, around €481 million of investment in transport is to be allocated for ports facilities.

In Budget 2008, the Minister for Finance Brian Cowen announced significant expenditure in the upgrade of transport facilities.

A budget of €3,837 million was allocated with a number of key improvements which are to be delivered in 2008 and over subsequent years. However, investment in ports did not figure on the list which could lead to the conclusion that Dublin Port is not high on the Government's list of transport priorities.

The relocation of a significant port facility is not unheard of. In Finland they have opted to relocate the north and west harbours of the Port of Helsinki to Vuosaari Harbour.

Vuosaari is north-east of Helsinki's port. Initial construction works began in 2003 with the new port due to start operating at the end of 2008. In order to facilitate the successful and efficient operation of the new harbour there has been significant capital expenditure to improve the infrastructure in the area surrounding Vuosaari, include the construction of a new motorway and the upgrade of rail services.

“ While the Dublin Port Authority may choose to disregard this potential, the Government can no longer overlook the high value alternative use that Dublin Port can offer

Closer to home, there are plans to relocate trading activities from Cork's City Quays to alternative facilities in the Ringaskiddy area of Cork Harbour.

The relocation of the facilities will allow for the significant re-development of Cork's docklands.

Through a joint venture between the Cork Port Company and Howard Holdings, an application was lodged to Cork City Council for a €1 billion development of Cork's docklands to include two hotels, office accommodation and residential units and a landmark building.

A new metro system is also planned to service the area and Cork City Council is seeking tax incentives from the Government for designated areas within the docklands.

Preparations for the development of Ringaskiddy appear to be taking shape as in November 2007 the Port of Cork Company lodged a planning application for the development of a new container terminal at Oyster Bank in Ringaskiddy

In light of the recent media coverage surrounding the purchase of shares in ICG, the Dublin Port Authority has come strongly to the fore playing down the development potential and value of the 33-acre ICG site. The ICG site and port lands have undoubtedly got development potential and, while the Dublin Port Authority may choose to disregard this potential, the Government can no longer overlook the high value alternative use that Dublin Port can offer.

Surely it's a contradiction to underutilise such a strategically placed asset when strong emphasis is placed on energy efficiency and sustainability.

The common characteristic of all of the suggestions that Dublin Port should be moved is that cost is no obstacle and this viewpoint is still evident today. The statement that Dublin Port's lands are significantly undervalued is repeatedly made without reference to the huge cost of replicating these port lands elsewhere. The reality is that building port infrastructure is phenomenally expensive and comparatively small port projects can be far more costly to deliver than headline grabbing property developments.

In more recent times, the challenge of Brexit has spawned a new line of argument about Dublin Port and, in 2018, the Irish Academy of Engineering (IAE) published *Brexit: Implications for Transport Infrastructure Investment*. In this study, the IAE said that Ireland needs to plan for a hard Brexit. The engineers identified that Ireland has an excessive dependence on Dublin Port (which handles 85% of the country's unitised trade) by making a comparison with UK ports (where none has a share of more than 20%). The IAE said that this dependence on Dublin Port increases traffic congestion on the M50, adds to unbalanced regional development and raises significant issues as to supply security. The proposed solution to these perceived problems was to divert 500,000 unitised freight movements to South Coast ports by 2020 or soon thereafter. This diversion would be supported by unspecified levels of capital investment which might attract EU or EIB funding.

There is a shared lack of specifics in the proposals of ESBI in 1990, the PDs in 2006 and the IAE in 2018. This is best seen, in the case of the IAE, in one of its conclusions:

The required re-routing of traffic could potentially be achieved at capital investment levels less than previously envisaged, provided alternative solutions are adopted for the provision of a motorway route connecting Galway-Limerick-Cork.

The idea that 500,000 unitised freight movements (one-third of Dublin Port's unitised volume in 2019) could be diverted to South Coast ports within two years is redolent of ESBI's naïve optimism in 1990 that a new port could be built at Loughshinney *within three to four years of approval, including planning approval*. All of the ferry companies and virtually all of the container lines which provide services in and out of Dublin Port also provide services in and out of other Irish ports.

This includes South Coast ports such as Rosslare and Waterford where there is, today, spare capacity available. Quite how 500,000 units might be diverted from Dublin Port to such ports within two years is, to put it mildly, unclear.

When the IAE says that Dublin Port's 85% share of unitised volumes is excessive by comparison to port market shares in the UK, it overlooks basic realities of geography. For example, if 500,000 unit loads could be diverted to south coast ports, they would still find their way to the M50 and to the Dublin region because that is where the demand for goods is concentrated. All that a diversion of 500,000 unit loads to ports between 170 kilometres and 260 kilometres from Dublin would accomplish is to increase national HGV tonne-kilometres and, by extension, national HGV carbon emissions by about 10%.

As a by-product of its suggestion that 500,000 unit loads be diverted from Dublin Port to South Coast ports, the IAE also said that 20 hectares of land could be made available for residential and commercial development on the Poolbeg Peninsula.

Just as the challenges of Brexit motivated the IAE's thinking that there should be a wholesale diversion of trade from Dublin Port, so also Dublin's housing challenges have prompted calls for Dublin Port's lands to be redeveloped for housing. In some cases, the movement of Dublin Port is, again, seen as an inevitability.

Where the RIAI in 1975 had extolled the attraction of a working port so close to the city centre, its president in 2018³ said:

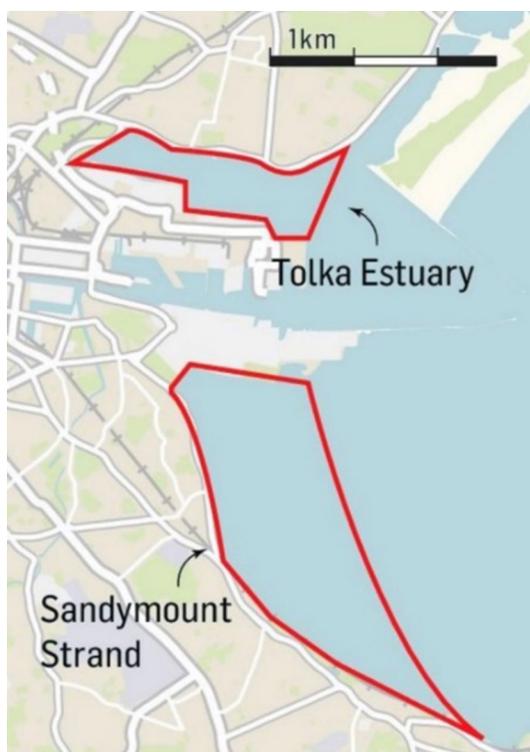
At some stage, the Port of Dublin will have to move. The relocation of the port is a golden opportunity to create a modern high density city within the city. If this is to occur, it is of great importance to start the relocation process now if relocation is to be completed by 2050. This is also a golden opportunity for the [Land Development Agency] to start making a real difference at scale. If we choose not to use the port for the sustainable growth of Dublin, we need a really viable alternative – where will this be?

The rhetorical question as to where the sustainable growth of Dublin will be accommodated is posed. The interrogative question as to where the port will be relocated is ignored.

In subsequent media coverage⁴, Patrick Abercrombie's *New Town Plan* of 1916 was referenced:

However, while elements of Dublin of the Future, the New Town Plan, by Patrick Abercrombie did go ahead, such as the development of Cabra and Crumlin, the Sandymount Strand and Tolka Estuary projects were abandoned in favour of the westward expansion of the city, Mr Browne said:

“The approach of successive Irish governments to the Abercrombie plan was to cherry pick bits of it. The attitude was, ‘We have loads of land so let’s just keep going,’ and look at what we’ve ended up with.”



Irish Times graphic, August 2019

Abercrombie's plan had envisaged 825 hectares of the bay being infilled for port and industrial purposes and a further 400 hectares for housing. In extolling Abercrombie's vision to provide housing in Dublin Bay as an earlier visionary solution to today's housing problems, the unhelpful problems of where to put Dublin's port facilities (which Abercrombie had addressed) were conveniently overlooked.

Where the RIAI suggested the relocation of Dublin Port as a long-term objective, others have suggested it as a short-term solution to Dublin's housing problems.

Of all of the challenges to provide much-needed additional housing in Dublin, a lack of land is not one of them. The Poolbeg Peninsula SDZ planning scheme envisages development at a density of up to 238 units per hectare to provide homes for 8,000 people. Since the time of Myles Wright, Dublin has sprawled westwards with housing densities in some outer suburbs of 27 units per hectare. If the whole land area of County Dublin could be developed at the density planned for the Poolbeg Peninsula SDZ, the county could house fifty million people. Even at the sprawl levels of the outer suburbs, County Dublin could accommodate almost six million people. The challenges of building new houses in Dublin are manifold and include, but are not limited to, land use planning and transportation. The idea that moving Dublin Port is necessary or essential to meeting Dublin's housing needs is simplistic and ignores three basic points.

Firstly, could a new port for Dublin get the planning and other consents necessary to construct it on a greenfield site on the east coast?

Secondly, the cost of the megaproject to build a new port would fall on the exchequer – it is incapable of being financed as a private sector project. Ireland started 2020 with a national debt of €200 billion and will finish the year with national debt approaching €230 billion. How conceivable is it that Government could commit to an unnecessary multi-billion euro megaproject any time soon?

Finally, even if it were accepted that Dublin Port should be moved to make way for housing and if the major challenges of planning and finance could be overcome, no new houses on former port lands would be available for at least 20 years. Would it not make more sense to spend the billions of euro that would be needed to have a new port available in 20 years time on new houses which could be available much sooner?

The same planning, environmental and financing challenges that would apply to the megaproject to build a new port for Dublin and to redevelop the vacated port lands for houses apply to Dublin Port Company's plans to develop Dublin Port to its ultimate capacity by 2040 in accordance with Masterplan 2040. In the latter case, these challenges are being overcome; in the former they are not even mentioned.

It has been suggested⁵ that the attitude of Dublin Port Company (its management and Board) is an obstacle to moving Dublin Port. This is not the case - we simply believe that it is not a good idea.

Our approach is to maximise the utilisation of the port facilities in Dublin Port between now and 2040. While we do this, we will plan for the development of new but additional (as opposed to replacement) port facilities on the east coast to be available by 2040. Over the next 20 years, we hope that a combination of factors will obviate the need to construct even these additional port facilities. These factors include the decoupling of port volume growth from economic growth, the provision of additional port capacity in other east coast ports and the generation of demand to use these other ports as a result of more balanced regional development in the country.

Over the past 30 years, there have been many calls to relocate Dublin Port and none has addressed the basic issues of the viability and cost of the megaproject to build alternative port facilities. The absence of focus on these underlying issues has allowed the attractive options that would emerge, once the existing port had been moved, to become the focus of attention.

Dublin Port Company has carried out initial detailed studies to design, cost and identify the planning and environmental challenges of the megaproject to build a replacement port for Dublin. We refer to this megaproject as DP2.0. The DP2.0 studies are intended to fill the information and fact vacuum which has allowed so many unfeasible ideas about moving Dublin Port to persist for 30 years.

In addition, we have completed similar studies for the alternative smaller project to build additional port facilities. We refer to this smaller megaproject as DP1.5.

The most fundamental challenge for both DP1.5 and DP2.0 is to decide what volume of throughput the proposed new port should be designed for. It is clear that neither ESBI's Loughshinney nor the PD's Broomore would have been anywhere near big enough to cater for the demand that emerged not long after they might have been built. Sizing the port to be built requires projections of port volumes long into the future.

Unfortunately, projecting future port volumes with any level of accuracy is not easy. This was notably demonstrated in the *Dublin Transport Initiative* report of 1995. This report projected that Dublin Port's volumes would reach 10.7 million gross tonnes by 2011. However, volumes through the port had already reached 21.0 million gross tonnes by 2000, just five years after the report was published.

This difficulty in 1995 of projecting future port volumes with any degree of accuracy was not new and, in 1972, *Studies in long term development of the Port of Dublin* recognised the same reality:

The fact is that the growth that has taken place in recent years has exceeded any forecast which might have been made even 10 years ago. This emphasises the timing difficulties with which we are faced in planning the orderly development of the Port area.

The very same problem remains today except now, if anything, future uncertainties are even greater as we try to reconcile our views on future long-term economic growth with the impacts of energy transition and digital technologies. It seems inevitable that port volume growth will plateau and, as a result, the need to build additional port infrastructure will diminish. However, we cannot predict when and to what extent this will happen.

The best megaproject is the one that can be avoided and we in Dublin Port Company hope that the need to build new additional greenfield port facilities does not arise. However, we have to ready ourselves to build them should they be needed and this requires us to look at what the level of demand for port infrastructure might be many years from now. Projecting port volumes long into the future presents us with a formidable conundrum.

“The best megaproject is the one that can be avoided and we in Dublin Port Company hope that the need to build new additional greenfield port facilities does not arise.”

5 Senator Michael McDowell: “We need a broad-ranging debate on whether former Senator Morrissey’s visionary plan for Dublin is the way forward or whether vested interests in the form of the Dublin Port Company and its desire to remain located at its current position should win out.” Seanad debates, 19th June 2019.

Ronan Lyons: “There are lots of options, not least Dublin Port, which is over 600 acres of prime land that could house as many as 60,000 of the homes needed. ...it would come with a fight, as Dublin Port has long resisted any attempts to move again.” Sunday Independent, 10th June 2018.