

From: [Irish Planning Institute](#)
To: [post2040](#)
Subject: IPI Submission on Dublin Port Post 2040 Dialogue
Date: Thursday 24 June 2021 16:35:59
Attachments: [Final IPI Submission on Dublin Port Post 2040.pdf](#)

Dear Sir/ Madam,

Please find attached the Irish Planning Institute's submission on Dublin Port Post 2040 Dialogue.


If the Institute can be of any further assistance, please do not hesitate to contact us.

Kind regards,
Michelle

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[Sent by email: post2040@dublinport.ie]

24 June 2021

Dear Sir/Madam,

The Irish Planning Institute (IPI) welcomes the opportunity to comment on the Consultation papers put forward by the Dublin Port Company entitled “Dublin Port Post 2040 Dialogue”. The Institute represents the majority of spatial planners in the State, and some 900 IPI Members work right across the planning system – in Planning Authorities, Regional Assemblies, semi-state organisations, An Bord Pleanála, and Central Government, as well as planning consultancies, and for developers. Many of the members are familiar with, and have worked on, plans and strategic infrastructure projects, including the implications of such projects on Natura 2000 sites and species.

The Institute’s policy is not to make comment on specific projects put forward by applicants or potential applicants for development. Accordingly, it does not wish to refer to any of the proposals of Dublin Port Company, as outlined in the consultation papers, in relation to planned expansions or improvements within Dublin Port itself, as these are matters for the relevant planning authority and An Bord Pleanála, as applicable. However, it does consider it appropriate to look at, and make submissions on, the wider planning and policy issues discussed in the consultation.

The following comments should be considered to be the Institute’s contribution to this dialogue.

1. The Necessity for Plan-Led Development of Ireland’s Ports.

The Institute considers that it is for Central Government, in the first instance, and not Dublin Port Company (or indeed any other Port Company or other private interests) to decide on the future shape of Ireland’s ports. To ensure rational future planning, it is essential that such future development be plan-led, and be decided as part of National Ports Policy, and then translated into specific programmes and plans in a future review of the National Development Plan and/or any necessary amendments to the National Planning Framework (NPF). This would include any decisions on whether additional port capacity within the State is required to be provided, and also the spatial locations(s) of any such additional port capacity.

2. The Case for Relocation of Dublin Port.

However, the Institute accepts the logic of the case put forward by Dublin Port Company in Consultation Paper no. 6, that it would not be appropriate, financially acceptable, nor in the wider public interest, for the relocation of existing port operations out of Dublin, and the consequent provision of an entirely new port to cater for the current, and planned, expansion of sea-borne trade serving the Greater Dublin Region, which is forecast, in the consultation, to be up to 77 million gross tonnes by 2040. In addition, the Institute concurs with the Port company's view that "*the capacity of existing brownfield port sites should be maximised before any greenfield development is progressed*" (page 8, Paper no. 7).

3. Additional Port Capacity beyond 2040.

The Institute considers that there may be some merit, as suggested in Consultation Paper no. 7, to consider and to plan for additional port capacity in the longer term. The Institute notes what the consultation paper described as DP1.5, which it is suggested might be located at other locations along the east coast, and also the planning, financial and – most significantly – the environmental constraints of any such proposal.

The need for such additional capacity should be determined by central government, as part of the National Ports Policy, and should take into account not only the financial costs of such capacity, but also the potential of expansion of existing ports, before opting for an entirely new supplementary port to Dublin Port. In this context, the changing nature of Ireland's trade, following Brexit, with a reduction in the amount of trade to the UK or using a UK "landbridge" and the likely expansion of direct services to the remainder of the EU, may strengthen the case for expansion, in particular of Rosslare and Waterford, and, to some extent, Cork, over an entirely new sub-port on the east coast.

Furthermore, the Institute notes the Port Company's own comment that any new port facility on the east coast "*should be avoided if at all possible or, at the very least, should be deferred for as long as possible*" (page 1 of Consultation Paper no. 7). However, it makes sense for the matter to be considered by central government.

Should it be decided that a new additional port is necessary, then the spatial location of such a new port would have to be determined, and its status (whether Tier 1 or Tier 2 in the Ports Policy Framework). Among the factors to be considered would include accessibility to the TEN-T network for road transportation, including the issue of whether there is spare capacity on this network to cater for the resultant port traffic, the likely final destination of such traffic (whether concentrated in the Greater Dublin Region or more widely distributed to other regions, and in particular the South and Mid-West), and also the potential for rail servicing. In addition, the potential for servicing offshore renewable energy in the Irish Sea and the Celtic Sea should be a factor in the choice of any such future port capacity.

In this context, the Institute accepts the general thrust of the Port Company's case, in Consultation Paper nos. 6 & 7, that a location south of Dublin, such as at Arklow, has significantly greater potential benefits and less environmental constraints than a location north of Dublin, such as at Bremore (or Drogheda). Of particular significance, which is referred to in the consultation papers, is the necessity to ensure compliance with EU Environmental and Habitats Directives. Institute members are familiar with, and have direct experience of, these Directives, including that of meeting the strict criteria under IROPI (Imperative Reasons of Overriding Public Interest). The Institute accepts the point made that

any future new port project would probably have to meet the IROPI requirements. These would mandate a full examination, from an environmental and habitats perspective, of alternatives, including alternative locations, and that approval by the Commission of any IROPI proposal by the State will be based on environmental and habitats criteria, and not on financial criteria. In addition, as the Ports Company will be aware, EU IROPI consent is limited to public sector projects, and is not open to private projects that have no public interest importance (and even then, only in exceptional cases). The Institute acknowledges, therefore, the preference in the consultation papers for Arklow rather than Bremore, but considers that ultimately this will have to be a decision of government, and not of any port company and/or its commercial partners.

4. The Role of the Public

The Institute considers that it is essential to stress that any project for port expansion, or indeed any new port facility, should enjoy public support. Apart from the present high level consultation that is provided for in this Dialogue, it is important that central government decision-making on National Port Policy is subject to public consultation (not just through public representatives but also directly), and that this should include the spatial element as well as the policy element. Furthermore, once a national decision is made, this will need to be translated into specific objectives in the relevant regional strategies and, crucially, in the relevant County Development Plan(s), which involve public consultation processes. It is only after these stages that any project proposals should be put forward.

The Irish Planning Institute is willing to engage further with Dublin Port Company, and indeed with central government, to provide its expertise and perspective in relation to the issues raised in this Dialogue. The Institute appreciates the opportunity to provide its views on the Dialogue thus far. If the Institute can be of any further assistance, please do not hesitate to contact us.

Yours sincerely,



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