

From: [REDACTED]
To: [post2040](#)
Subject: FW: dbw submission re3fm
Date: 30 June 2021 14:22:05
Attachments: [Dublin Bay Watch Final submission re 2040 development.doc](#)

From: Joe and Liz Nolan [REDACTED]
Sent: 30 June 2021 11:49
To: Charlie Murphy
Subject: dbw submission re3fm

[REDACTED]
Attachment is our submission re the above.
Thanks
Joe Nolan

Dublin Bay Watch

30th June 2021 Dublin Bay Watch response to Dublin Port Company (DPC) consultation regarding the development of Port infrastructure in Ireland beyond 2040.

Dublin Bay Watch (DBW), a not-for-profit community group in place to protect Dublin Bay, has reviewed the DPC Masterplan and the 7 consultation documents prepared on behalf of DPC regarding the future of Port infrastructure in Ireland with special reference to a variety of roles the Dublin Port could play in meeting the National Port infrastructure needs beyond 2040.

Firstly, DBW welcomes both the Development plan to 2040 and the 7 consultation documents. The development plan sets out the vision for the future (to 2040) development of Dublin Port. DBW agrees with the thrust of this plan which is to deliver additional capacity within the current Port footprint with improved use of Port lands and more efficient operating and logistic systems. DPC has phased the identified developments to deliver their plan into three segments, each building on the previous segment. This will enable DPC to deliver the Plan in an incremental cost effective and logically efficient manner. The final phase of the Plan relates to the 3FM project which envisages the development of Port lands on the Poolbeg Peninsula and the development of a new bridge to provide Southern Port access among other transport and community projects. DBW has concerns regarding this final segment of the development Plan, which has set out on page 54 the possible requirement to infill 12 acres of the Port. While this possible infill would be within the current area of the Port but would be a regrettable move given the amount of land already available at Poolbeg. To be considering the possibility of infill given the amount of land a sister semi state company (ESB) already has in a strategic portion of the Port is a major concern.

Another concern for DBW relates to the capacity figures used in the Development plan and later in the various consultation documents. These figures postulate a tonnage capacity by 2040 of 77 million gross tonnes per year. These figures have not been adjusted in the light of Brexit and while initially reasonable for use in the 2012 Development plan, they need to be independently reviewed rather than being accepted as fact in the various proposals set out in the consultation documents.

Given that Dublin Port is operating in the midst of the city, is adjacent to two major recreation areas and next to a protected environmental area, the vista issues are important for coexistence with the citizens of and visitors to the capital. An example of positive mutual benefit is the recent painting of the large Gas tank at the entry to the Port. This of course is part of the ESB lands but the rest of the so called oil farms comprise rusted tanks showing considerable disregard for the citizens of the capital.

The various dialogue documents produced by DPC are to be welcomed. They are in our view well researched and postulate succinctly many of the options DBW put to DPC over 20 years ago. DBW has never sought the removal of Dublin Port from its current location only the efficient use of Port lands and the removal of non -Port activities from the footprint of the Port. DBW has on numerous occasions suggested the removal of the oil tanks from the Port and the building of a pipe-line from the Port to the vicinity of Dublin Airport where an oil tank farm could best be accommodated releasing significant Port lands for reuse and eliminating significant transport movements. Given the plans regarding Poolbeg the removal of the ESB oil farm and tanks should be progressed as soon as possible.

DBW has reviewed the dialogue proposals regarding the building of new Ports in Bremore and in Arklow as well as possible Port expansion in Rosslare, Waterford and Dun Laoghaire. Given the location of Bremore the amount of land available, deep water access, and the connectivity with transport hubs this has for many years been the preferred recommendation of DBW. Each of the possibilities set out in the discussion paper 7 has merits and DPC in its summary correctly identifies that the responsibility for the next steps lies with Government. Apart from the provision of affordable and social housing this is the most important infrastructural project for Government in the next 20 years. It requires detailed investigation given the environmental, transport and business issues raised by each of the possible options set out in paper 7. DPC has correctly pointed out that the Irish economy is dependent on Port infrastructure capacity and in the second half of this century additional capacity will be required regardless of the veracity of current DPC 2040 capacity projections.

DPC dialogue paper 7 raises the core issue of the very significant costs involved in implementing any of the possible options. While this is a valid issue the cost of doing nothing could have significant negative effects. Implicit in the DPC papers is that DPC in such a scenario, would seek to provide additional capacity from Dublin Port. A major concern for DBW is that there is no analysis as to what this might entail, yet DPC are putting a strong case for the capital cost benefits of an incremental infrastructure delivery system which is similar to what DPC is currently engaged in via its 2040 development plan. For Government and the people of Dublin what such a future incremental infrastructure growth plan in Dublin Port beyond 2040 might entail needs now to be made explicit so that it can inform a proper discussion.

Overall DBW welcomes the dialogue papers and is keen to engage with DPC, Dublin City Council and central Government in an independent and detailed analysis of the full range of possibilities beyond 2040 and the capacity needs which may arise. DPC is in our view correct that planning for the future of National Port infrastructure cannot be left on the long finger given the extensive nature of the environmental, transport, business and cost issues involved.

Yours Sincerely

Liam O Dwyer

Dublin Bay Watch: “to improve and protect the amenity that is Dublin Bay and its environs for the benefit of all” Liam O Dwyer, Joe Nolan, Mona O Leary, Justin O Flaherty, Peter Bailey, Gerry Breen