



Submission to the
Pre-Draft Plan Public Consultation
for the
Dublin City Development Plan 2022-2028

22nd February 2021

This submission from Dublin Port Company (DPC) to the Pre-Draft Plan stage of the City Development Plan 2022-2028 is intended to contribute to the big picture vision that will shape the new plan. The physical scale of Dublin Port is such that our submission makes reference to specific major developments proposed in the [Dublin Port Masterplan 2040](#).

The land area of Dublin Port is 260 hectares and, when the waters enclosed by the Tom Clarke Bridge and the two sea walls are included, the extent of the Port increases to 860 hectares – a bigger area than the Phoenix Park. The Port and the Park and the River that links them give the City its shape.

Where the value of the Park to the City has never been doubted, the same cannot be said of the Port and this has led, in recent years, to suggestions such as:

- Moving Dublin Port entirely
- Infilling Dublin Bay and the Tolka Estuary

As DPC brings Dublin Port to its ultimate capacity over the next 20 years, we are concerned that the undervaluing of the Port could create obstacles to the delivery of our vision for Dublin Port. This vision is fully compatible with the ten development themes identified in DCC's *Strategic Issues Paper*. Beyond this, our vision for Dublin Port can contribute substantially to the development of the eastern fringes of the City for the benefit of the citizens of Dublin.

We have recently published a series of papers as part of the [Dublin Port Post 2040 Dialogue](#) in which we [identified](#) that the idea of moving Dublin Port makes no sense. It would cost €8.3 billion (at 2020 prices) and take not less than 20 years to move what is, arguably, the single most important transport infrastructure asset in the country. However, it would be extraordinarily difficult, if not impossible, to secure planning permission because of environmental impacts and it would take not less than ten years just to confirm this.

We hope that the notion of moving Dublin Port has now been decisively addressed once and for all and that we can rely on the next and subsequent City Development Plans to continue to support the development of Dublin Port by way of three Strategic Infrastructure Development projects:

- The Alexandra Basin Redevelopment Project - **ABR Project**¹ - which has been consented and is under construction
- The second Masterplan project - **MP2 Project**² - which has been consented with construction works due to commence in 2022
- The third and final Masterplan project - **3FM Project** - the scope of which is set out in Masterplan 2040 and involves development of port lands on the Poolbeg Peninsula and the construction of a new bridge to provide a Southern Port Access Route (SPAR). (**Appendix 1**).

¹ ABR Project, PL29N.PA0034, 10 year grant dated 8th July 2015

² MP2 Project, PL29N.304888, 15 year grant dated 11th July 2020

The scale of the **3FM Project** is such that it is an inescapable part of the big picture vision for the City Development Plan. This submission, therefore, focuses on how delivery of this project, and of Masterplan 2040 as a whole, can contribute very substantially to the themes identified in DCC's *Strategic Issues Paper* while also satisfying the economic and planning imperatives to provide port capacity for Dublin, for the Greater Dublin Area and for the country as a whole.

Predicting how much port capacity will be needed over the next twenty years and beyond is formidably difficult but it does seem inevitable that the rate of future growth [must slow down](#). Our objective in DPC is to maximise the capacity of Dublin Port within the limits set by Masterplan 2040 while also encouraging the provision of additional capacity in [other east coast ports](#).

We are doing this to try to obviate the need for the construction of a major new east coast port to provide the capacity that will be required for future growth once Dublin Port reached its limit. We [estimate](#) that such a new port would cost €3.9 billion (at 2020 prices) if constructed at Arklow or €4.2 billion if built at Bremore.

If we are to achieve our objective, it is important for the City Development Plan to address two big picture transport issues in co-ordination, firstly, with [NTA's](#) Transport Strategy for the Greater Dublin Area 2022-2042 and, secondly, with TII's national road infrastructure plans. These two transport issues are³:

- The Eastern Bypass
- The new crossing of the Liffey (the SPAR) which we are proposing as part of the **3FM Project**

We believe that it is timely to look critically at the Eastern Bypass as the City Development Plan 2022-2028 is being prepared. In the fifty years since the Eastern Bypass was first proposed⁴, much has changed and we need to ask whether there is any place in a 21st century City Development Plan for old roads engineering thinking. With major development imminent on the Poolbeg Peninsula and DPC plans and projects underway to create a high quality greenway along East Wall Road, the indicative alignment for the Eastern Bypass which DCC is obliged to take account of is a blight. It is important for the success of the next City Development Plan that this blight is removed.

Likewise, it is important for our proposed SPAR that the City Development Plan brings certainty to north-south connectivity across the Liffey. Is the aspiration in the current plan to have a LUAS link from the Point to the Poolbeg Peninsula necessary or realistic?

More generally, achieving *Sustainable Movement and Transport* requires a solution to the challenge of moving goods. Dublin Port is a major generator of HGV traffic and, as unwelcome and unloved as HGV traffic is, it is not going to disappear during the course of the next or subsequent City Development Plans. It is important, therefore, that the City Development Plan 2022-2028 supports measures to minimise the impact of HGV traffic by facilitating its segregation from other road traffic

³ Dublin City Development Plan 2016-2022, [Mapset J](#)

⁴ *Transportation in Dublin*, An Foras Forbartha, 1971

to allow HGVs to move free of congestion (as we envisage the SPAR making possible in the **3FM Project**). If this can be achieved, and if car traffic can be greatly reduced by other means throughout the City, then it becomes possible to address the City's air quality challenges. Under DPC's plans, all port-related HGV movements would be taken off public roads such as Pigeon House Road, the Tom Clarke Bridge and East Wall Road. This would add greatly to the success of the five axle HGV ban in improving City life since 2007.

In presenting issues relating to port capacity, a proposed motorway and HGVs, we recognise that these are not inherently attractive issues which obviously contribute to the ten themes in DCC's *Strategic Issues Paper*. The main objective of this submission is to highlight that, in fact, the development of Dublin Port can make a very substantial positive contribution in a range of areas beyond cargo handling and the transport of goods. This is possible because, in addition to its port capacity objective, Masterplan 2040 also has a second equally important objective of reintegrating Dublin Port with Dublin City.

For forty five years from 1965 to 2010, the port authority (initially Dublin Port & Docks Board and, from 1996, Dublin Port Company) tried to develop the Port in a manner that was unsustainable. Moreover, it was [unpopular](#) with the citizens of Dublin and led to considerable ill feeling towards the Port.

For the past ten years, since 2010, we have tried to put the development of the Port onto a sustainable footing. Viewed from the minimalistic perspective of getting the recognition required in the planning system to facilitate grants of planning permission - particularly for SID applications to An Bord Pleanála - this effort has been successful. However, the Port is so important to the City that these planning achievements in recent years are a bare minimum of what should and can be done in such a large and important area of the City.

Our perception is that Dublin Port remains a tolerated but unloved industrial complex and that many think that the City would be better off if only the Port could be made to disappear. The lands of the port are still viewed as a Klondike by developers and the great big idea of moving the port and all the supposed benefits that that would bring lingers stubbornly.

The somewhat nebulous objective of reintegrating Dublin Port with Dublin City supports many of the themes presented in DCC's *Strategic Issues Paper*. The projects which are delivering this reintegration objective are already creating large new areas of public space in a manner and to a scale that will, in a relatively short period of time, transform the look, feel and experience of the eastern fringes of the City. This transformation is underpinned by a commitment to proper planning, sustainable development and great design. Most importantly, the transformation is being accomplished by a self-financing State-owned company which is committed and able to deliver on its vision.

For example, in the 25 years from 1996 to 2020, DPC has invested €722 million. Over the coming ten years to 2030, the pace of investment will accelerate and it is planned to invest a further €869 million. A City Development Plan supportive of Masterplan 2040 will enable DPC to complete

works which will transform the public realm on the eastern edges of the City both on the north side of the Liffey and on the south side.

Our central idea and contribution to the vision for the next City Development Plan is that it should provide as much certainty and clarity as possible for the development of the 860 hectares of Dublin Port's land and water area. Our development objectives on the 260 hectares of port land are well set out in Masterplan 2040. Likewise our Port-City integration objectives are by now well developed and clear to see on the north side of the Liffey not only in specific projects and initiatives which we have completed - notably the Diving Bell on Sir John Rogerson's Quay and the project to open Port Centre on East Wall Road – but also in projects which we have recently commenced such as the [Liffey-Tolka Project](#), the Tolka Estuary Greenway and the [Flour Mill Masterplan](#). These latter projects are part of a wider initiative to create a *distributed museum* in and around Dublin Port (**Appendix 2**).

These initiatives, in conjunction with the **3FM Project**, would also provide the central section from Clontarf to Sandymount of the wider Sutton to Sandycove route.

What has emerged from the Masterplan's objective to reintegrate the Port with the City is a programme of development which will create a unique fusion between the working port and the living city. Where much of the cultural life of the City depended in decades past on unused spaces such as the Dandelion Market and Temple Bar and, more recently, on peripatetic events such as the Dublin Flea Market, the developments in train on the north side of Dublin Port are creating high quality spaces which will be dependably available to contribute to the heritage, culture and recreational life of the City long into the future. The first of these developments is the 6,500 square metre [Graving Dock and Pumphouse Heritage Area](#) on Alexandra Road and this will be completed by the middle of this year. Even while it is under construction, this space has already hosted [theatre](#) productions which could not otherwise have happened because of the pandemic.

Our hope for the City Development Plan is that it will bring certainty that the developments we are proposing in Dublin Port to achieve the objective of Port-City integration can be delivered. DPC is in the unique position of having the intentions, the vision and the resources to deliver projects which can support the four themes of,

- Sustainable Movement and Transport
- Green Infrastructure, Open Space, Recreation and Natural Heritage
- Built Heritage and Archaeology
- Culture

The ambitions, plans and projects we have for the north side of Dublin Port are mirrored by our vision for the south side of the Port and we intend, through the **3FM Project**, to begin to bring this vision to fruition in the period of the City Development Plan 2022-2028.

As well as being the country's largest cargo port, Dublin Port is also a major tourism gateway. Ferry passenger traffic alone makes Dublin Port larger than Shannon Airport. In addition, Dublin Port has developed as a major cruise port with 230,000 passengers on 158 cruise ship arrivals in 2019.

Whereas the current City Development Plan 2016-2022 and Masterplan 2040 have a shared objective of growing Dublin's cruise tourism business still further, DPC took the [decision](#) in April 2020 not to proceed with the development of berths adjacent to the Tom Clarke Bridge to accommodate the largest cruise ships. In doing this, we confirmed that Dublin Port will continue to facilitate cruise ship arrivals on multi-purpose berths to the greatest extent possible subject to the constraint of prioritising cargo ships. It will be important for the next City Development Plan to reflect DPC's changed priorities in respect of cruise tourism under the theme of *The City Economy*.

The themes of *Climate Action* and *Sustainable Environmental Infrastructure and Flood Risk* will shape much of the thinking in the City Development Plan 2022-2028. Climate action will need to include both mitigation and adaptation. For Dublin Port, adaptation planning has commenced and we are completing detailed studies on the impacts of sea level rise on the Great South Wall and on the North Bull Wall. From these studies, we will identify what works will be required to protect Dublin Port and any such works will form an important part of City wide adaptation plans in response to the threat of sea level rise.

To conclude, we welcome the opportunity to contribute to the development of the big picture that will inform the City Development Plan 2022-2028. Long-term planning is formidably challenging and complex and we hope that this submission can positively and meaningfully contribute to resolving some of the many challenges which the next City Development Plan will have to address.

Notwithstanding the scale and complexity of these challenges, there is an exciting opportunity now to recognise in the Dublin City Development Plan the port capacity requirements mandated at all levels of the planning hierarchy⁵ in a manner that contributes, in the words of the *Strategic Issues Paper*, to

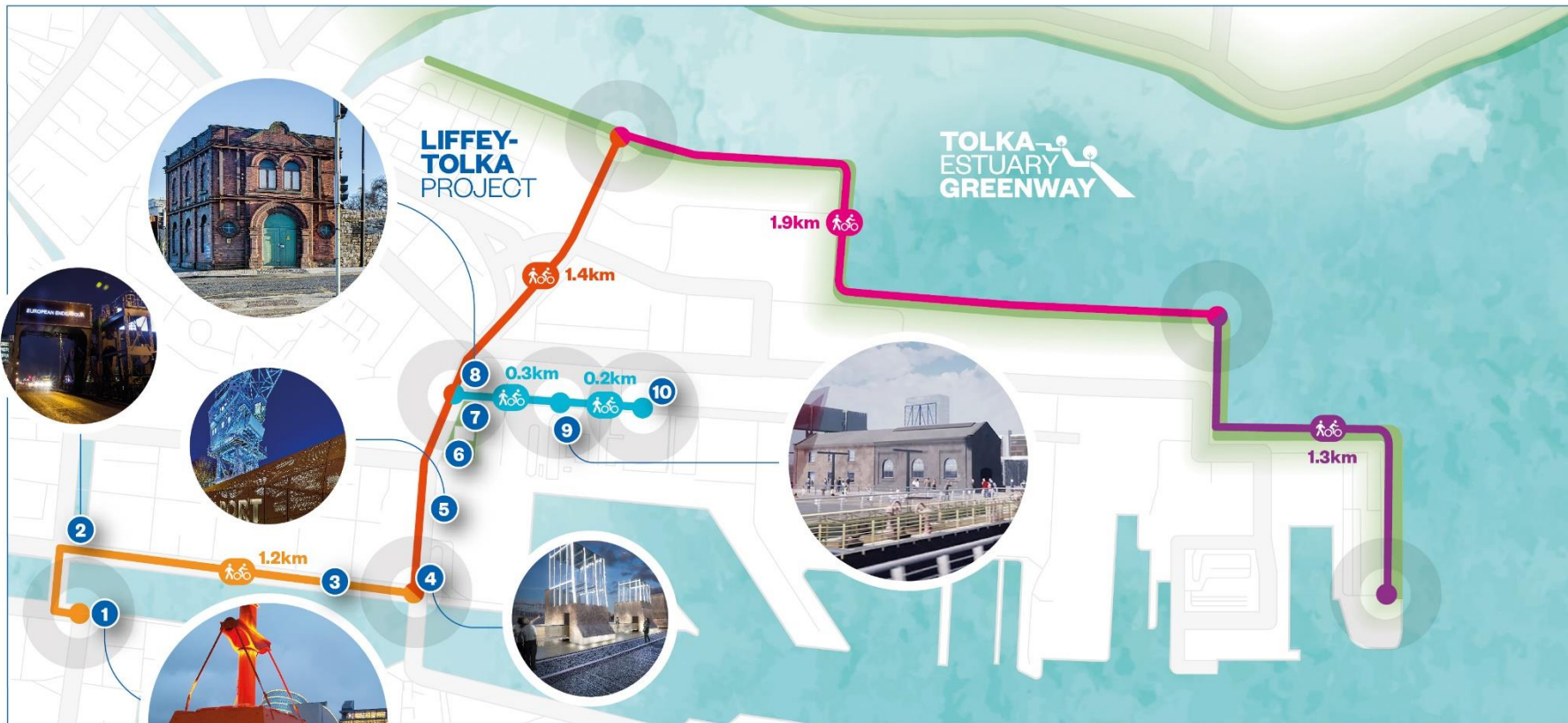
... the continued consolidation of the City, sustainable patterns of development and the creation of a dynamic and vibrant City core complemented by well serviced and integrated neighbourhoods.

Dublin's first port authority – the Ballast Office Committee of Dublin Corporation - was established in 1707 and, as we bring Dublin Port to its ultimate capacity some 333 years later, we believe that DPC can make a major and important contribution to the development of the eastern edge of the City in the period of the next Dublin City Development Plan from 2022 to 2028 and in the two subsequent plans to 2040.

⁵ European TEN-T policy, the National Planning Framework, the Regional Spatial and Economic Strategy for the Eastern and Midland Region and National Ports Policy

Appendix 1 – Preliminary General Arrangement for the 3FM Project

Appendix 2 – Dublin Port’s *distributed museum*



ROUTES

-  From Diving Bell to Berth 18 - 1.2km
-  Liffey-Tolka Pedestrian and Cycle Route - 1.4km
-  Detour to The Pumphouse and The Flour Mill - 0.5km
-  Tolka Estuary Greenway - Phase 1 - 1.9km
-  Tolka Estuary Greenway - Phase 2 - 1.3km

LANDMARKS

- | | |
|---|-----------------------------------|
| 1 Diving Bell | 6 Port Centre |
| 2 Scherzer Bridge | 7 Maritime Garden |
| 3 Crane 290 | 8 The Victorian Substation |
| 4 Blood Stoney Blocks Installation | 9 The Pumphouse |
| 5 Crane 292 | 10 The Flour Mill |