



SAMRA
Sandymount
Dublin

FAO Mr Eamonn O'Reilly
Chief Executive
Dublin Port Company

30th December 2021

DUBLIN PORT 3FM PROJECT PROPOSAL – Pre-Planning Consultation Response

Dear Mr O'Reilly,

We refer to your recently launched 3FM Project, currently at the Pre-Planning stage and inviting comments for submission by 31st December.

We have had one meeting with your Community engagement team and offer thanks to them for the help provided to our questions and enquiries.

Overall, it appears that the 3FM project has adopted an approach based on engineering expedience and meeting the needs of the existing commercial enterprises operating on the peninsula with little regard to optimising land use and protecting and enhancing the public amenity on the Poolbeg Peninsula.

We assert that Dublin Port should be consolidated on the North Bank and the south side protected and developed as sustainably as is possible, consistent with Dublin Bay's status. i.e. an accredited UNESCO Marine Biosphere and an EU Conservation Area. This large scale expansion will introduce significantly increased levels of emissions, pollution and noise which is at complete odds to all declared objectives.

Most cities, even without such natural unique attributes are now reversing the expansion of ports and industrial complexes at their centres due to identified risk and the need to integrate sustainably with their communities for the long term. This is moving entirely in the opposite direction.

Given the declared sensitivities we assert that this should not be going ahead.

Our position is that the design must be completely revised during the next stage and integrated with the long term objectives of the Dublin City Development Plan, as opposed to continued incremental expansion of the port facilities on prime unique landscape.

Developments on the peninsula should only consider innovative solutions that have a markedly positive impact on the long-term development of the peninsula as a public amenity for the city AND be carbon neutral.

We believe that the approach for Dublin Port Company should be to maximise efficiency of operations on the north quay, using new technology, consolidating facilities and expanding operating hours to maximise the use of existing facilities and infrastructure.

We call for an international comparator study to establish the land use by Dublin Port per tonne of goods handled per year. Given the criticality of this finite central city land space, we would expect this to positively benchmark with other ports to ensure the most efficient use is being made of existing space. This would be a prerequisite BEFORE considering new brownfield expansion options, which should also include other deep-water locations for further post 2040 expansions.

We also suggest that a design competition for maximising the community gain on the peninsula should be performed.

This would assure the investment deserving of Ireland's capital city population.

Specific Comments – aligned to DPC proposal :

1. Southern Port Access Route (SPAR)

The purpose of this project is to link the north and south port areas, taking HGVs off the public road via a new bridge across the River Liffey immediately east of the Tom Clarke Bridge.

We are strongly opposed to this project scope.

It appears to have been designed with little or no regard for its impact on the local community and the amenity value along the Pigeon House Road.

It will create significant permanent noise, pollution, and vibration for residents on the Pigeon House Road. It will block the view of the river and reduce the amenity of the park area on this road.

It will enable HGVs to enter into Sandymount and use the Beach and Strand roads to access arterial routes. Despite a prohibition of HGVs from these roads at present, policing is inadequate and this prohibition is being ignored by HGV drivers.

We believe that consolidating the Ro-Ro and Lo-Lo facilities on the north port will remove the need for this bridge and road.

The bridges will have the effect of limiting access to the Liffey eg. The Tall-Ships will potentially be unable to dock on Sir John Rogerson's quay.

2. New Ro-Ro freight terminal

We believe the Ro-Ro expansion requirements should be met by consolidating and improving the efficiency of facilities on the north quay. This would remove the need for the SPAR road and the storage facilities on the south port.

Consideration should be given to moving less obtrusive and impactful facilities from the north quay to facilitate expanding the Ro-Ro facilities on the north port.

3. Largest container terminal in the country

The location of the largest container terminal in the country in a 7.1 hectare area adjacent to Sandymount Strand and away from the proposed Ro-Ro facilities reflects a disinterest in the future of the area as a community amenity. This will generate avoidable traffic, noise and pollution, and represent a permanent eyesore. It will be a significant retrograde step in the development of the peninsula.

It will be visible to tens of thousands of people from the Pembroke Quarter Development, visitors to the area and residents in Sandymount.

This area should be developed as a public amenity.

Every effort should be made to reduce levels of container storage with the introduction of significant disincentives for operators to store containers on the port site which could easily be stored off site. This would be an outcome of the northside optimisation.

Where container storage is required, we believe serious consideration should be given to below ground storage facilities.

4. Ship turning circle in front of Pigeon House Harbour

We assert that additional shipping requirements should be located on the north side.

5. 1.0-hectare site to accommodate utilities

This area should be developed as a public amenity.

6. Community gain

In reality, there is little in terms of Community Gain being offered by this proposal.

There is so much more potential and opportunity available if a green long term vision was applied to the benefit of the community, adjoining this unique UNESCO Biosphere.

This is not just a locally based comment, *this unique peninsula area should be regarded as a national amenity which has walking access to a large percentage of Ireland's population living within just a few kilometres.*

Specifically :

- Dangerous wastelands at the start of the south wall should be made into an additional park
- The Pigeon House Generating Station is a landmark feature of the Dublin skyline and it has been left to deteriorate. This building could be recommissioned as a museum, like the Tate Modern in London, adding a centrepiece to the Irish capital city. This contrasts sharply with current plans to wrap a new road around the building and front it with the country's largest container port with an annual throughput capacity of 360,000 containers
- Cycle lanes which abruptly stop at the wastewater treatment facility should be expanded to the length of the peninsula

Other – Transportation

- This is a critical area of concern not considered in the proposal, when the combined pressure of the adjacent Pembroke Quarter alone which is already approved with phase 1 underway, is expected to deliver homes for more than 9,000 people when fully completed. This alone will put considerable additional strain on the existing transport infrastructure – before any port expansion.

- The LUAS link is not confirmed on the Dublin Port proposal and would be delivered by NTA/DCC, which could be many years after a sharp expansion of all related traffic has occurred completely overloading existing infrastructure routes in the interim.
- The M50 tunnel will potentially need expansion to deal with the higher truck volumes associated with a claimed 360,000 container throughput, combined with currently expanding waste incinerator capacity

Concluding Comments :

- 1) We have a high density of population in the adjacent Dublin City centre, high competition for central land and the approved addition of +10,000 people to the local area
- 2) It is asserted that this incremental port development is not the appropriate priority for utilisation of this finite city central resource, which is part of a UNESCO Biosphere, and as a consequence of which will become permanently and irretrievably transformed into an industrial corridor.

SAMRA's position is that this development should not be going ahead and that the lands should instead be developed as a public amenity.

For and on behalf of SAMRA Committee



David Turner
Chairman

Cc :

TDs : Ivana Bacik; Eamon Ryan; Jim O'Callaghan; Chris Andrews
Pembroke Cllrs : James Geoghegan; Dermot Lacey; Paddy McCartan; Claire O'Connor; Hazel Chu