



Mr. Barry O'Connell
Chief Executive
Dublin Port Company

SAMRA
Sandymount
Dublin

By email
9th June 2023

RE: Dublin Port 3FM Project

Dear Mr O'Connell

Thank, you for your letter dated 30th May 2023.

This was a follow up letter to the meeting with yourself and your leadership team with representatives from SAMRA on 4th May 2023.

We found the meeting and the information that you provided in your follow up letter somewhat disappointing.

When the 3FM project was first launched in November 2021 and submissions were invited, SAMRA made a submission by the tight deadline of 31st December. There was no follow up with SAMRA in relation to the content of this submission before the 3FM was launched for the second time in April 2023. As far as we could see this relaunched plan was the same as the plan launched in November 2021 and our concerns raised in our December 2021 submission were not taken on board.

It was only after we made our views on the relaunched 3FM plan know publicly through the media that we were invited to a meeting with you and your team. This meeting was after the initial deadline for receipt of submissions to the relaunched plan on 28th April, which we submitted against.

At this meeting we stated very clearly that our primary objection to the 3FM plan was the plan to build the largest container storage facility in Ireland on the Poolbeg Peninsula. To recap on our concerns.

- **Noise** – characterised as low frequency, intermittent and is particularly disruptive to sleep. The issue of the facility being able to operate within night-time noise restrictions was raised during the meeting and it was speculated that if the regulations could not be met the facility would only operate during the day. This suggests that there is the potential that this asset could be underutilised because of its proximity to residential areas.
- **Location** – beside the Nature Reserve and adjacent to the unique UNESCO protected biosphere
- **Visual** – 3 stack containers plus crane gantry
- **Scale** – container storage will cover a site area of 5.9 hectares, nearly 15 acres, larger than the Nature Reserve itself
- **Volume** - almost 1000 container movements a day
- **Transportation** - increased HGV haulage = increased exhaust pollution
- **Heavy Industrial Impact** - on the south peninsula

- **Health and Safety Risk** - increased by proximity of containers to residential areas

1. *Land used for non-core activities*

During the meeting on 4th May we asked what progress had been made in implementing the 2014 Franchise Policy. The document of the same name “shows a total of 40.8 hectares of port lands which are today [2014] used for non-core activities. DPC believes that all such activities can equally well be carried on outside the port estate.” (Page 7). We are keen to find why more land is being appropriated while existing land in the port area is being used for activities that could be carried out away from the port.

At the meeting we were advised that progress had been made but nobody at the meeting could provide information on what quantity of the 40.8 hectares was no longer being used for non-core activities. We were advised that this figure would be provided to us as a follow up action to the meeting. This figure was not included in your letter dated 30th May. We are assuming that this figure is in fact not known by DPC.

Perhaps you could clarify this?

2. *Demonstration of containers*

We presented to the meeting visuals showing that the three high container storage facility and associated gantry cranes would be visible from the Sandymount side of the Poolbeg Peninsula. Your team advised that the containers would not be visible. They suggested that the DPC would install some containers stacked three high to demonstrate that they would not be visible.

You have advised in your letter of 30th May that installing these demonstration containers is taking longer than you anticipated as you need to arrange insurance to have the containers transported on a public road. **We look forward to hearing from you when this demonstration is in place.**

3. *Inclusion of container storage in the Master Plan*

During the meeting we expressed our understanding that the plan to build the container storage facility on the Poolbeg Peninsula was not included in the Master Plan. We were advised that it had always been included in the Master Plan. In your document “Dublin Port Masterplan 2040 – Reviewed 2018” we do not see a reference to the container storage terminal at Area O https://www.dublinport.ie/wp-content/uploads/2018/07/DPC_Masterplan_2040_Reviewed_2018.pdf **Could you advise where and when the container storage facility in Area O was included in the Master Plan please?**

4. *Other options*

At the 4th May meeting we requested confirmation that there is no other viable option on any part of the port facility to site container storage other than site Area O.

There was no information in relation to this query provided in your letter of 30th may.
We await same.

5. *Community Investment*

During the meeting you made the point that the 3FM project included an investment of 100 million euro in community gain activities and if the container storage facility did not go ahead these benefits would not materialise. In my letter to you dated 12th May I expressed the hope that as the project is debated over the coming months that the argument that SAMRA's objection to your plans for Area O could in anyway be potentially denying the community these gains does not enter the debate. You have repeated this point in your letter of 30th May 2023. It suggests that if your plans for the container storage facility planned for Area O do not go ahead, the 3FM project will not be viable and the community will be denied a 100-million-euro investment. We take exception to this veiled threat to marginalise the Sandymount community by suggesting that SAMRA's objection to one element of the 3FM project could scupper the potential community gain objections for the complete project. Such a threat really does not engender good community relations and we ask again that it not be used as a justification to ignore the Sandymount community's objection.

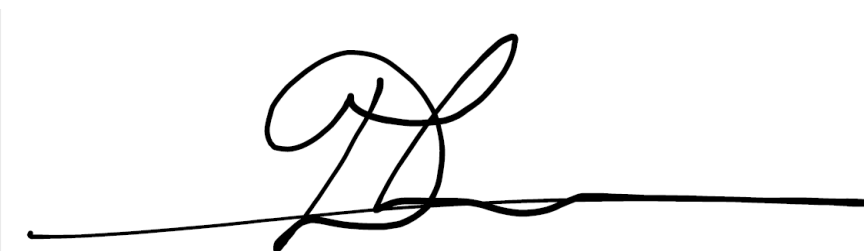
Based on our engagement so far with Dublin Port Company we do not at this stage share your confidence that you can find solutions which will address the concerns of our members and, as you put it in your letter, *"over time create an amenity which we can all enjoy and be proud of"*. It is hard to understand how the proposed container facility could ever be *"an amenity which we can all enjoy and be proud of"*.

Also, from our experience we would not characterise our engagements so far with the Dublin Port Authority as consultation. It has simply advised what it is planning to do, failed to provide straight forward information requested and strongly intimated that SAMRA could be to blame for the 100 million euro it is planning to spend on community gain projects not being realised.

We would encourage you to reflect deeply on whether your commitment to community consultation and positive engagement is real.

We look forward to hearing replies to the queries outlined above.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'D. Turner', written over a horizontal line.

David Turner

Chair, SAMRA
Sandymount & Merrion Residents Association

Cc Public Representatives; SAMRA.ie