



An Integrated Economic, Cultural and Environmental Vision for Sustainable Development



## Submissions Report



April 2008



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# Executive Summary

CDM & partners completed their economic, amenity and environmental study of Dublin Bay, including the Dublin Port area, in July 2007. This study is intended to be the first stage in the preparation of a strategic framework plan for the Dublin Bay area that will guide stakeholders in the long-term development of this resource.

Following its presentation in draft format to elected members of Dublin City Council in September 2007, the document was put on public display and sent out to those who had contributed to the two public meetings and numerous stakeholder consultations held during preparation of the report. This completed the third phase of public consultation.

The draft report elicited an extensive and varied response, commensurate with the amount of interest the project has attracted over its duration. Almost 400 submissions were received by the Dublin City Council Planning Department, coming from a wide variety of sources and these naturally reflected diversity of opinion in addition to many interesting observations.

Debate about the future of Dublin Bay has been an ongoing for many years, and many of the responses repeated long-held positions without necessarily considering the report in its entirety. Similarly, many chose to focus on specific issues which they did not like (such as climate change).

Nevertheless, the overwhelmingly majority (75%) of submissions favoured Option 7 (relocation of the Port to an alternative location and redevelopment of the port lands). This was assisted by active engagement of householders in the Clontarf area by organisations such as Dublin Bay Watch with a strong interest the outcome of this debate, and a history of opposition to plans by Dublin Port Company to reclaim further land to extend the port estate. It is clear that a positive position by Dublin City Council in favour of Option 7 would be broadly welcomed by this constituency.

However, many submissions reflected a wider perception of the potential positive benefits of moving the port to the environment of Dublin Bay (which is universally appreciated) and Dublin City. A widespread perception that relocation of Dublin Port to an alternative location was a question of when, not if, also came across many of the submissions. It is clear that Dublin City Council, through favouring Option 7, would be perceived by most submissions as acting in the best interests of the Bay and the city.

Notwithstanding several submissions by interested academics, there remains a limited understanding of how individual environmental aspects of Dublin Bay (such as intertidal habitats, birds) interact with each other, and indeed national and local environmental policies and legislation. The remit of Dublin City Council in protecting Dublin Bay through best management practices and application and legislation needs to be clarified.

Numerous comments on the climate change proposals in the draft report reflected a low level of understanding of the measures available to reduce the imminent threat faced by homes, businesses and important habitats to sea level rise, and by extension, increased risk of flooding.

Several submission were made by individuals who appear to have developed an incorrect perception that the preferred option for the Dublin Port area was linked to the climate change concepts presented in the draft report. Notwithstanding that the future of Dublin Bay is now inextricably linked to factors such as sea level rise, the City Council should elaborate upon their response to climate change in a separate context to the future of the port lands.

A number of submissions (including the submission from Dublin Port Company (DPC) and transport organisations) made observations which extended beyond the remit of the study, regarding such issues as: (i) proposed new location for the port; (ii) how to maintain trade movements during any move; (iii) how the port should be moved; and (iv) how the city will accommodate increased population density and transport issues (non-car modes of movement and possible integration of Eastern Bypass Scheme). These technical issues require investigations which can be dealt with as part of specific studies (including the Dublin Port National Development Plan study to be commenced shortly by the Department of Transport).

While DPC commissioned several reports addressing key conclusions of the draft report, very few new facts were presented. The capital costs that they estimate to be required to relocate the port broadly confirmed that presented in the CDM report.

The benefits, both tangible and intangible, to the Dublin City, and the Dublin region, from redeveloping the port lands were not addressed in the DPC submission. Much of their technical discussion centred on the unsuitability of possible alternative locations for the port; they suggest that an identical sized land bank to the DPC lands at Dublin Port needs to be acquired before the port can be relocated, but also state that DPC only operates on a fraction of their lands in Dublin, while the remainder are used by tenants for their own activities. DPC notes that further study is required to address the practicalities and challenges that moving the port would present.

DPC also notes that Irish Ports as operated today only ranked 64<sup>th</sup> in terms of efficiency in the world which is a serious issue for export and import trade.

The submissions were strongly supportive of protecting and improving the overall environment and biodiversity of the bay as a whole, reflecting the widespread appreciation of the natural resource. The concept of a marine reserve, the implementation of coastal zone management and better governance were all perceived to be essential to the long term future of the bay.

# Section 1

## Introduction

Dublin City Council commissioned a wide-ranging economic, amenity and environmental study of Dublin Bay, including the Dublin Port Area. The study team was led by CDM in association with DTZ, EDAW and Moffatt & Nichol and commenced work in November 2006. The draft report, issued in September 2007, outlines a vision for the area around Dublin Port and is intended to be the first stage in the preparation of a long-term strategic framework plan for Dublin Bay.

The study analysed the current and possible future scenarios for the bay, with input from a wide range of stakeholders. The remit of the study included six key issues to be addressed:

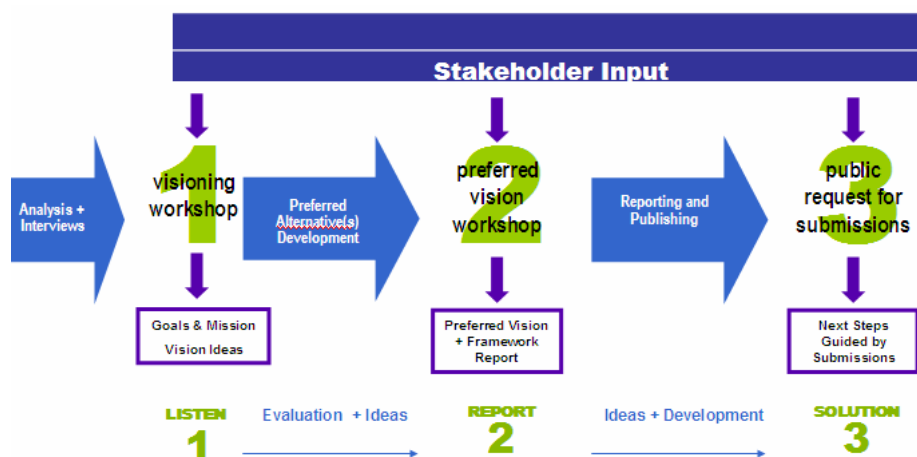
- Stakeholder Engagement;
- Baseline Analysis of the Bay;
- Visions, Options and Analysis for the port area (including cost benefit analysis);
- Environmental and Amenity designations;
- Coastal Zone Management; and
- Guidelines for Sustainable Use of the bay.

The study area included all coastal zone lands within the administrative area of Dublin City council, including the designated lands along the Bull Island, together with the port lands.

### 1.1 Stakeholder Engagement

The future of Dublin Bay has been the subject of ongoing debate for several decades and as this was addressed through extensive stakeholder engagement during and subsequent to the preparation of the report. The three-phase approach used is shown in Figure 1.

Figure 1: Phases of Stakeholder Engagement in the Study



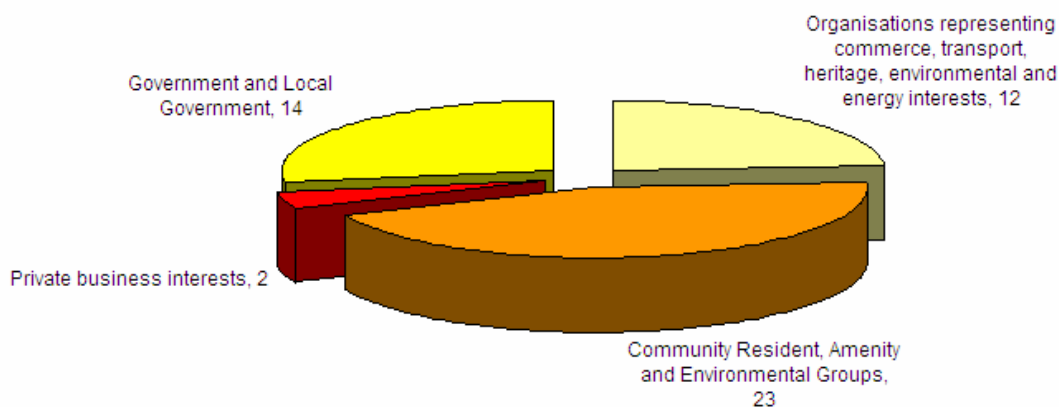
### ***Phases 1 and 2: Determination of Alternative Visions***

In the first phase visioning workshop, the remit of the study was explained and stakeholders were encouraged to identify what they value most about the bay today and give their opinions on current and future policy. This input was used in the visioning process to help develop possible future scenarios.

In the second phase, the preferred vision workshop, stakeholders were presented the range of scenarios developed for the port area, as it is widely acknowledged and understood that the evolution of Dublin Port is central to the future shape and character of the bay. The objective of the study was to be as inclusive as possible. Open discussion amongst different stakeholder groups was facilitated to foster appreciation of the depth and complexity of issues and perspectives.

Over 180 stakeholder organisations and individual representatives were invited to engage in the first two phases. In total 51 stakeholder organisations were engaged in visioning and preferred vision workshops as shown in Figure 2 below.

**Figure 2: Stakeholder Organisations Engaged in the Visioning Workshops**



### ***Phase 3: Submissions after publication of report***

The report was published in September 2007, and a third phase of stakeholder engagement was initiated. The final report was presented to the elected representatives of Dublin City Council, while stakeholder organisations engaged in the process were supplied with a copy of the final report.

Dublin City Council published public notices in two national newspapers on the 28<sup>th</sup> September 2007 to announce the completion of the study and the release of the final document. The report was put on public display for a period of nine weeks from Monday 1<sup>st</sup> October 2007 until Friday 30<sup>th</sup> November 2007 at four locations across the city, viz the Civic Offices, the Central Library in the Ilac Centre and Raheny and Pearse Street libraries.

The report was also made available on Dublin City Council's website ([www.dublincity.ie](http://www.dublincity.ie)).

## Section 2

# Overview of Submissions

This section presents an overview of the submissions received following the public display. Dublin City Council received and registered 400 submissions. Each submission was read and evaluated, although this report presents only a summary of that evaluation.

To ensure all issues were included in the analysis, a matrix of responses was created which broke down responses into common issues, organised using the chapter structure of the draft report.

Many submissions were also received in relation to the climate change section. It should be noted that the purpose of this section was to highlight the importance of climate change in any future planning in Dublin Bay. The scenarios outlined were intended to open and foster discussion on this issue and were not conceived in the more detailed manner of the rest of the report, and in particular did not form part of the stakeholder engagement. The submissions made under this section are therefore addressed separately in Section 4.

### 2.1 Origin of Submissions

Submissions were mainly received from across the Greater Dublin Area, with only a five submissions received from outside of Dublin. These were from Naas, Co. Kildare, Ashbourne, Co. Meath, Kilkenny and Clare.

Submissions from the north bay area came from respondents in Sutton, Raheny, Donnycarney, Artane, Killester, Clontarf, Marino and Fairview, on from the south bay area included Ringsend, Sandymount, Blackrock, Glasthule and Sandycove and Dun Laoghaire.

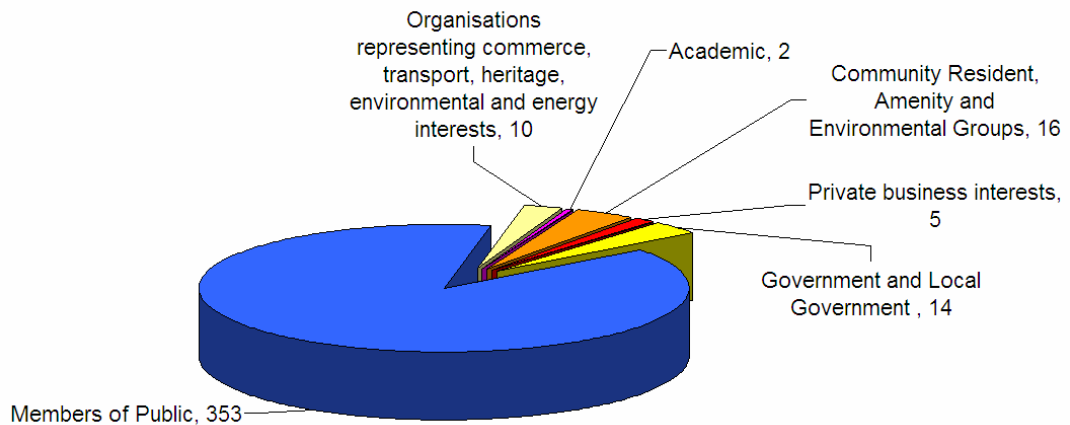
Submissions from the Greater Dublin Area came from respondents in Ballymun, Santry, Whitehall, Cabra, Chapelizod, Ballsbridge, Rathmines, Rathfarnham, Tallaght, Ballinteer, Stillorgan, Swords, Portmarnock, Malahide and Balbriggan.

Some 353 (88%) submissions were from members of the public, of which 298 (75%) were from residents living in the north bay areas.

Submissions were also received from numerous organisations representing varied interests including academics, community groups, public representatives, environmental NGOS, business groups and private business interests. The breakdown of submissions can be seen in Table 1 below.

Figure 3 shows an overview of the 400 individuals and organisations that submitted to this phase of the project.

**Figure 3: Origin of Submission (type)**



**Table 1: Breakdown of Submissions**

Stakeholder Group (400)	Name
Academics (2)	Prof. James G. Wilson , Trinity College
	Dr. Robin Edwards, Trinity College
Business Groups Representatives (2)	Dublin City Business Association
	IBEC
Community Group (16)	Sutton Golf Club
	Dublin Bay Watch (2 submissions)
	Dodder Anglers Club
	Poolbeg Yacht & Boat Club: Sea Angling Section
	Clontarf Yacht & Boat Club
	Dublin Bay Environment Protection Group
	Boosterstown Nature Reserve Management Action Committee
	Bull Island Action Group
	Richmond Tolka Group
	Save our Seafront
	Greater Dublin Bay Alliance
	Sandymount & Merrion Residents Association
	Sandycove and Glasthule Residents Association
	Bath Avenue & District Residents Association
	Ringsend Sandymount Environmental Group
	Environmental NGO (3)
Irish Seal Sanctuary	
An Taisce	
Governance (9)	Department of Environment, Heritage and Local Government
	Mr Battie White, Deputy City Engineer, Dublin City Council
	Biodiversity Officer, Dublin City Council
	Dublin Regional Authority
	Eastern Regional Fisheries Board
	ESB (2 Submissions)
	Railway Procurement Agency
	National Roads Authority

Stakeholder Group (400)	Name
Members of public (353)	North Bay (298), South Bay (17), Rest of Dublin (19), Rest of Ireland (4), Unknown Location (15)
Politician (10)	Seán Haughey T.D. Minister of State
	Finian Mc Grath TD
	Thomas P. Broughan T.D.
	Richard Bruton T.D.
	Ruairi Quinn T.D
	Ciarán Cuffe T.D.
	Senator Ivor Callely
	Councillor Gerry Breen
	Councillor Naoise O Muiri
	Councillor Bronwen Maher
Private Business Interest (2)	Treasury Holdings
	Tom Phillips & Associates
Private Business Interest at Port (3)	Dublin Port Company
	Peel Holdings Limited
	Ecocem Ireland Ltd.

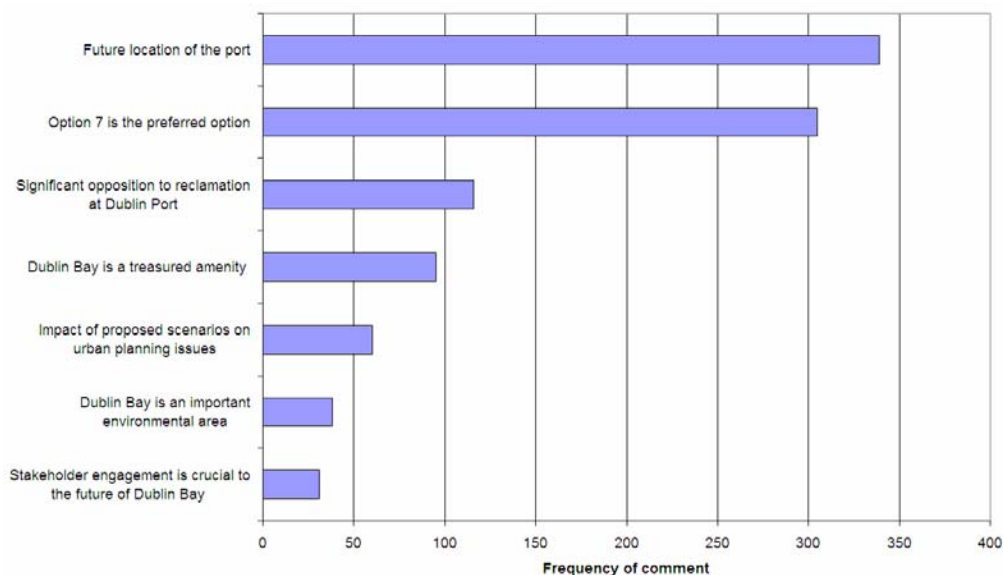
## 2.2 Critical Issues

The submissions represent a wide diversity of views and concerns. The array of issues identified in the submissions confirms the future of Dublin Bay will inevitably be a contentious and complex issue. In total, some 17 unique issues have been identified, as shown in Table 2. Of these, seven issues received the bulk of the comments, as shown in Figure 4.

**Table 2: Broad issues contained in submissions**

Original Study Heading	No.	Issue
Stakeholder Engagement	1	Stakeholder engagement is crucial to the future of Dublin Bay
Baseline Analysis	2	Dublin Bay is a treasured amenity
	3	Dublin Port is of strategic importance to the national economy
	4	Dublin Bay is an important environmental area.
	5	Flooding and Climate Change are of major concern.
	6	Other issues of siltation at Bull Island, traffic, Ringsend WWTP and the proposed Incinerator need to be managed in future visions
Vision, Options and Analyses	7	Option 7 is the preferred option
	8	More information is needed before a decision can be made.
	9	Future location of the Port
	10	Significant opposition to reclamation at Dublin Port
	11	Development options : Environmental impacts
	12	Development options: Infrastructure issues- drainage, transport and electricity
	13	Development options: Social and Urban Planning issues and ideas.
Environmental and Amenity Designations	14	Where and how to extend or revise environmental designations
	15	Extension of revision of amenity areas encouraged
Coastal Zone Management	16	Introduction of Coastal Zone Management is strongly sought and supported
Guidelines for Sustainable Use	17	Strong support for a governance organisation for Dublin Bay: Marine Reserve

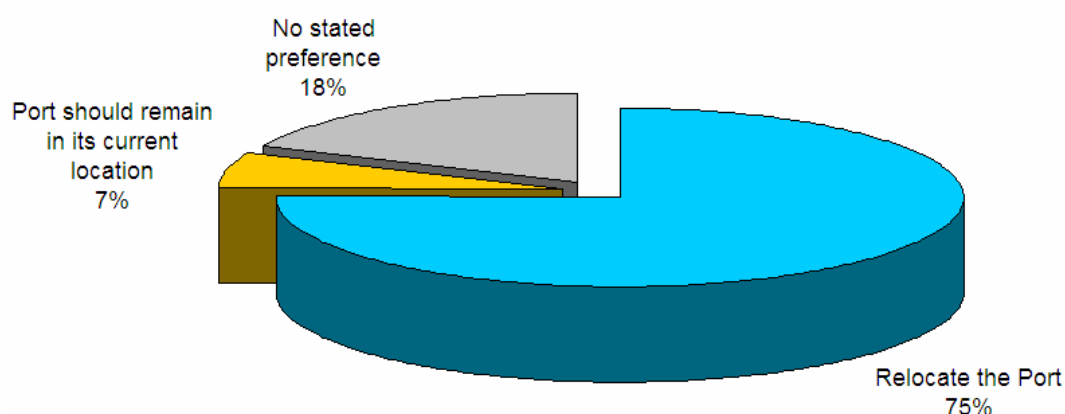
**Figure 4: The seven most important issues**



### **Key Issue 1: the future location of Dublin Port (339 submissions) & Option 7 is the preferred option (303 submissions)**

The most frequently mentioned issue across all of the submissions was the location of the port, and the prospect of changing this location. In the draft report, most of the scenarios considered variations on moving some or all of the port. Option 7 was overwhelmingly the most popular of these options: it proposed relocating all Dublin Port facilities out of the city with the exception of ferry and cruise line services. The port lands could then be re-developed for residential, commercial and amenity purposes. .

**Figure 5: For and against movement of Dublin Port pie chart**



Of the 339 (75%) submissions in favour of moving the port, 293 were members of the public. Two community groups Dublin Bay Watch and Bull Island Action Group, Dublin City Business Association, a private business interest (Treasury Holdings) and three politicians Seán Haughey T.D. Minister of State, Councillors Gerry Breen & Naoise O Muiri (both Fine Gael) also came out in favour of moving the port. Peel Holdings Ltd, a private business interest at the port expressed support for Option 7 as a long term vision but hoping immediate capacity constraints could be resolved in the short term.

The preference for Option 7 was stated in 303 submissions of which 294 were from members of the public. It should be noted that extensive lobbying in the Clontarf area by Dublin Bay Watch saw 67% of total submissions come from this part of the city, predominantly in favour Option 7.

Some 26 (7%) of the submissions were against moving the port. These included 17 members of the public, Clontarf Yacht and Boat Club, Richmond Tolka Group, Sandymount and Merrion Residents Association and Ringsend Sandymount Environmental Group. Two business interests at the port including Dublin Port Company and Ecocem Ireland Ltd (a tenant on the port lands) expressed opposition to moving the port as did three politicians: Thomas P. Broughan TD (Labour spokesperson on Transport and the Marine), Ruairí Quinn TD, and Senator Ivor Callely.

Some 73 (18%) submissions expressed no stated preference, with these submissions tending to be of a specific nature from state organisations including departments with Dublin City Council, the Railway Procurement Agency, the National Roads Authority, the Dublin Regional Authority and the Department of Environment, Heritage and Local Government.

Some 53 community individuals and groups made observations regarding reclamation, siltation around Bull Island and climate change without stating a preference on the future of Dublin Port.

**Figure 6: Written Submissions to Dublin Bay and Port Area Study - Stated Preferred Option**

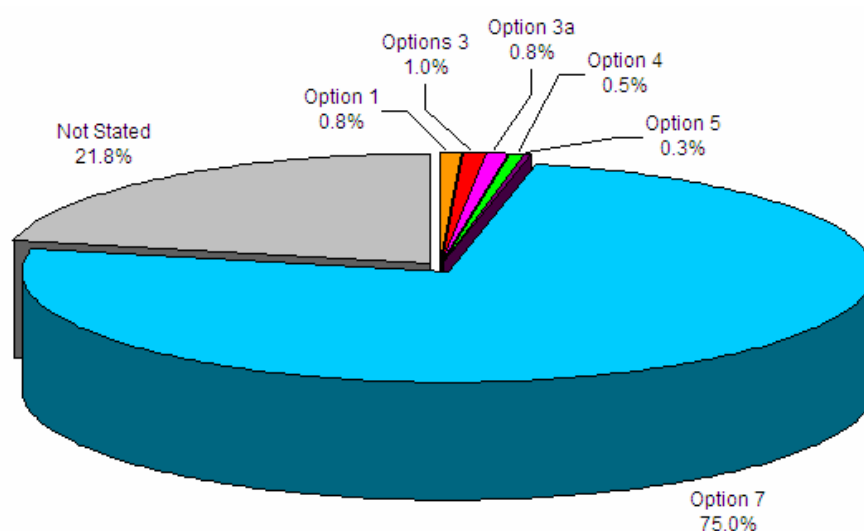


Figure 3 shows the stated preferred options in the submissions, with 75% of the 401 submissions stating a preference for Option 7. This was seen as a sustainable long term vision for the future of Dublin with submissions suggesting:

- It would offer the highest return to Dublin in terms of jobs, housing, growth, amenities and low environmental impact.
- It is an opportunity to create a new state of the art port with no capacity restraints and the possibility for future growth.
- An opportunity to reverse some of the negative impacts of urban sprawl in terms of long commuter times.
- Welcome because it did not include any additional reclamation of land.

Table 2 details the origin of submissions with a stated preference for Option 7.

**Table 2: Submissions with a Stated Preference for Option 7**

<b>Submissions - Stated Preference for Option 7</b>		
<b>(75% Total Submissions)</b>		
<b>Stakeholder</b>	<b>No.</b>	<b>Origin of Submission</b>
<b>Members of Public (294)</b>	256	<b>North Bay</b> (Artane, Clontarf, Donnycarney, Eastwall, Fairview, Killester, North Strand, Portmarnock, Raheny, Sutton).
	5	<b>South Bay</b> (Ballsbridge, Ringsend, Sandymount, Blackrock)
	14	<b>Rest of Dublin</b> (Balbriggan, Ballymun, Cabra, Chapelizod, Palmerstown, Rathfarnham, Santry, Swords, Whitehall)
	4	<b>Rest of Ireland</b> (Kildare, Kilkenny, Meath)
	15	Unknown Address
<b>Amenity Group</b>	1	Dublin Bay Watch
<b>Business Organisation</b>	1	Dublin City Business Association
<b>Environmental NGO</b>	1	Bull Island Action Group
<b>Politicians</b>	3	Seán Haughey T.D.Minister of State, Stephen Rea Fine Gael, Councillor Naoise O Muiri
<b>Private Business</b>	1	Treasury Holdings
<b>Private Business Interests at Port</b>	1	Peel Holdings Limited
<b>TOTAL</b>	302	

**Key Issue 2: Significant opposition to further reclamation by Dublin Port Company (116 submissions)**

Continuing a debate which has lasted many years, many submissions raised objections to further reclamation of land to expand the port. The principal concerns raised about reclamation are flooding and a study commissioned by Dublin Bay Watch which states that the Port does not require additional land (this was also submitted previously in response to an Environmental Impact Statement prepared by Dublin Port Company).

**Key Issue 3: Dublin Bay is a treasured amenity (95 submissions)**

The quantity of submissions detailing the importance of the Bay to the daily lives of residents shows that all decisions relating to any future development of the bay will be of significant public interest.

Submissions addressing this issue noted some recreation and amenity activities in Dublin Bay, including some omitted from the draft report. The submissions conveyed the strong sense ownership of Dublin Bay which residents and visitors alike have demonstrated during each phase of the stakeholder engagement.

Many submissions emphasised the importance of protecting and preserving the amenity uses of the bay for future generations (as opposed to the environmental assets).

## Section 3

# Evaluation of Responses

This section presents an overview of the submissions received following the public display. Dublin City Council received and registered 400 submissions. Each submission was read and evaluated, although this report presents only a summary of that evaluation.

Dublin Port Company's submission included three separate reports addressing various issues. These were prepared by three consultants: MacCabe Durney, Consultant Town Planners, CB Richard Ellis commercial real estate advisers and Jim Power, an economist.

### 3.1 Stakeholder Engagement

#### **Issue 1: Stakeholder engagement is crucial to the future of Dublin Bay (31 no.)**

Most organisations and many individuals welcomed the opportunity to make a submission on the draft report, and expressed a wish that this would be an ongoing process of engagement.

A small number of submissions were dissatisfied with the stakeholder process, including IBEC (felt the process presented a limited suite of options).

Submissions from outside the Dublin City Council administrative area felt that the release of the report had not been adequately publicised, and noted (as had been raised during the project) that the issues addressed in this study affect the entire bay, and regretted that other Local Authorities had not been more involved in the process.

### 3.2 Baseline Analysis

#### **Issue 2: Dublin Bay is a treasured amenity (95 no.)**

The quantity of submissions detailing the importance of the Bay to the daily lives of residents shows that all decisions relating to any future development of the bay will be of significant public interest.

Submissions addressing this issue noted some recreation and amenity activities in Dublin Bay, including some omitted from the draft report. The submissions conveyed the strong sense ownership of Dublin Bay which residents and visitors alike have demonstrated during each phase of the stakeholder engagement.

Many submissions emphasised the importance of protecting and preserving the amenity uses of the bay for future generations (as opposed to the environmental assets).

#### **Issue 3: Dublin Port is of strategic importance to the national economy (9 no.)**

Dublin Port Company reiterate that the port is a strategic piece of national infrastructure, critical to the effective functioning of the national economy. This is

discussed in detail, pointing out that this is highlighted in the National Spatial Strategy 2002 – 2020 and the Regional Planning Guidelines for the Greater Dublin Area 2004 -2016.

IBEC note that Dublin Port is a key asset of national infrastructure, and that significant additional port capacity is urgently required.

Dublin Bay Watch acknowledges the importance of Dublin Port both strategically and nationally.

#### **Issue 4: Dublin Bay is an important environmental area (38 no.)**

A range of submissions from the public requested protection for wildlife, marine life and birds for future generations and asked for no further pollution of the bay. The Irish Seal Sanctuary noted that harbour seals and marine mammals were not considered in the draft report and that grey seals are thought to still breed in the bay.

Birdwatch Ireland note that whilst EU Directives afford protect to designated sites, they also protect individual species and habitats outside of designated sites. The ESB also noted other EU legislation to be recognised including the EU Water Framework Directive and the EU Floods Directive.

#### **Issue 5: Flooding and climate change are a major concern (28 no.)**

Flooding and climate change were mentioned in 7% of submissions largely from concerned residents of the bay. Many of these submissions expressed concern that further reclamation might cause flooding. An EPA report was cited as having recommended against further infill of land in Dublin Bay, although no reference was given.

#### **Issue 6: General issues (72 no.)**

**Bull Island Causeway:** Many submissions expressed concern at the level of siltation occurring behind Bull Island. In general the causeway was seen as the cause of this siltation and submissions suggested breaching the causeway to solve this problem. The Department of Environment, Heritage and Local Government and the Biodiversity Officer for Dublin City Council stated that numerous reports had been commissioned to assess the impact of the causeway and all of them had recommended leaving the causeway as it currently stands.

**Traffic:** 30 submissions noted traffic as an issue of concern in the Dublin Bay area.

**Ringsend WWTP:** Two submissions mentioned the odour issues with Ringsend WWTP.

**Waste to Energy Plant:** 8 submissions mentioned the proposed waste-to-energy facility at Ringsend, in the context of plans to develop the South Bank and Poolbeg Peninsula for residential purposes.

### 3.3 Vision, Options and Analyses

#### **Issue 7: Option 7 is the preferred option (305 no.)**

As discussed in Section 2, Option 7 of the draft report (full relocation) is the stated preferred option of 75% of submissions. Submissions listed the following reasons for their preference:

- For long-term vision and sustainable development;
- To safeguard the amenity of Dublin Bay into the future and improve access;
- To prevent further infill of the Bay;
- To create a new state of the art port facility in a new location, capable of growth into the future;
- For business including ratepayers to Dublin City Council;
- To help reduction of urban sprawl;
- For non-car modes of transport/ capitalise on major investment into public transport systems of the moment;
- For tourism reasons;
- To connect the city centre to the necklace of villages around the bay; and
- An opportunity for a new exciting extension to the city.

#### **Issue 8: More information is needed before a decision can be made (7 no.)**

Dublin Port Company believes that a first step towards a partnership between Dublin City Council and Dublin Port Company to solve these issues should include a refocused study “addressing the practicalities and challenges that relocation would present”. Dublin Port Company believe that planning guidelines, locations for the movement of current business activity at the port, oil storage facilities, costs and the impacts of any proposed relocation for the regional and national economy all need further consideration.

Many stakeholders including Dublin Port Company noted the requirement for environmental assessment of proposed plans including Strategic Environmental Assessments and Environmental Impact Assessments.

Professor J. Wilson of Trinity College also noted that the developing of a new port facility would require careful consideration of the impact on natural habitats, coastal currents and sediment transport.

#### **Issue 9: Future location of the port (339 no.)**

As discussed in Section 2, 75% of submissions would be in favour of relocating the port. Those in favour stated the possibility to implement Option 7, relocate the perceived risk of the oil tanks, and to prevent further reclamation as key benefits.

These submissions also noted the opportunity to create a modern new port at a different location without the capacity constraints which limit the present facility.

A significant number of submissions mentioned the possibility of moving some port functions to other ports along the coast. Drogheda, Bremore, Greenore and Arklow were mentioned as possible ports which could benefit from this.

Those submissions which were against moving the port (25 no.) noted cost, preserving Dublin's port heritage, preserving sports facilities and an excess of empty housing in Dublin as factors in their choice.

Ecocem Ireland Ltd, an importer and processor of dry bulk cargoes at Dublin Port strongly object to the movement of the Port. As a producer of cement marketed for its environmental benefit, location is essential to their business model.

Dublin Port Company's vision sees Dublin Port at the heart of Dublin Bay and Dublin City, helping to develop sustainable communities with an active and operational port. They are opposed to relocation for a number of reasons:

1. Movement of the port prior to opening a fully functional new port would result in serious dislocation of trade to Ireland (an unlikely scenario).
2. Dublin Port Tunnel 'whose primary objective is to facilitate Dublin Port Traffic' at a cost of €750 million, would not be properly utilised as without Dublin Port.
3. CBRE estimate the total cost of moving all tenants and uses from the current port location to a new site, could reach in excess of €4.26 billion (broadly similar to the estimates prepared by the CDM report).
4. Increased costs due to funding a new port and increased travel times would further damage Ireland's attractiveness as a location to do business.
5. Under the Harbours Act 1946 Dublin Port Company only has the right to revoke property rights given to tenants if the development is to be used for port related uses only.

#### **Issue 10: Significant opposition to reclamation at Dublin Port (116 no.)**

Over 30% of submissions highlighted opposition to further land reclamation by Dublin Port Company.

Dublin Port Company states that they require an additional 52 acres to ease capacity constraints. Other business interests at the port also suggested the completion of the reclamation scheme as a short-term option. It also notes that Irish Ports are only the 64<sup>th</sup> most competitive port in the world according to World Economic Forum rankings, which is "unacceptable in Ireland's increasingly globalised economy".

The Biodiversity Office of Dublin City Council notes that any land-take from the Special Area of Conservation or Special Protection Area is prohibited under the EU Habitats Directive and the EU Birds directive unless an exact re-creation of the habitat could be achieved in an alternative location.

The Eastern Regional Fisheries Board expressed concern regarding any land reclamation projects as this could impact on fisheries.

#### **Issue 11: Development Options: environmental impacts (12 no.)**

A number of stakeholders expressed concern regarding environmental impacts of future development at Dublin Port.

Birdwatch Ireland suggested that proposed developments could include habitat creation. The Eastern Regional Fisheries Board and Dodder Angler's Club noted the Option 7 would create a significant impact on estuary in additional sewage and trade effluent load. The Biodiversity Office of Dublin City Council submitted the Dublin City Council Biodiversity Action Plan 2008-2012 which should be consulted in case of any future development.

#### **Issue 12: Development Options: infrastructure issues -drainage, transport and electricity (10 no.)**

**Drainage:** Mr Battie White, Deputy City Engineer, cited the Greater Dublin Strategic Drainage Study and noted that drainage infrastructure planned for Dublin region has not yet been built. A wastewater treatment plant planned to the north of Dublin was expected to be constructed but construction has yet to commence due to difficulties in locating the plant. To address current and future capacity issues this plant must be constructed before any development on such a significant scale can occur.

**Transport:** The National Roads Authority (NRA) felt that transportation emphasis in any proposed redeveloped options should focus on non-car modes of transport. However any development would need to be compatible with the Dublin Port Tunnel.

The NRA has recently completed a feasibility study into an Eastern Bypass to connect the Dublin Port Tunnel to the Southern section of the M50. This has been forwarded to the Minister for Transport for Government consideration.

The Railway Procurement Agency notes the criteria necessary for an optimised Luas. It is very likely that the location would meet all criteria and a Luas is seen as a good option for this site. A Luas in this area would be an extension of the C1 line which is currently under construction and planned to terminate at the Point Depot. Specific technical details for optimisation of a Luas in this area were included.

**Electricity:** The ESB states that there are three power generating stations within the boundary referred to in the study which play a critical role in the delivery of electricity supply to Dublin and beyond, delivering up to 30% of Ireland's supply. They will remain in situ for the foreseeable future.

ESB notes that a key principle of the Dublin Bay Study should be the protection and development of electricity utilities; including power generation, transmission and distribution. These generating stations should be omitted from the final footprint and development zones of the plan. The North Wall generating station has been included in Options 1 - 7 of the plan but should be excluded from any future development boundaries.

ESB is fully supportive of a vision for Dublin Bay that avoids conflict between proposed development and existing and proposed utilities.

**Issue 13: Development Options: social and urban planning issues and ideas (60 no.)**

The necessity for social housing is highlighted in a number of submissions, in addition to the location being favourable to shorter commuting times and increased uptake of public transport. Some submissions express a wish that Dublin takes more advantage of its waterfront location.

A consortium of landowners at the western side of the port submitted details of a proposed master plan for an area of approximately 60 hectares in East Wall. The existing land uses include East Point Business Park, Merchant's Yard, CIE railway lines to the Docks, the Point Depot Site (undergoing major redevelopment) and the Dublin Port lands at Alexandra Basin. This submission noted that the master plan will have full regard to the key issues and themes of the Dublin Bay Study. The submission also noted concerned that these lands could be released for development in the short to medium term rather than be caught in long term strategic development plan.

Mr Stephen Rea (aligned to Fine Gael) submitted proposals for two major developments that could feature as part of redevelopment at the port lands. The first suggestion was a Dublin City Airport as a future for corporate air travel into and out of the city. The second suggestion was an international water sports centre and bay side leisure & environmental complex.

A number of residents around the bay appreciated the idea of a 'necklace of villages' around the bay. It was suggested that they could be connected by water taxi.

The issue of appropriate building heights was raised.

### **3.4 Environmental and Amenity Designations**

**Issue 14: Where and how to extend or revise environmental designations (10 no.)**

Elected representatives from Dublin City Council and Fingal County Council recognised a need for clear mechanisms for review of protective environmental measures.

The DEHLG noted that boundaries for SAC and SPA have to be agreed with the EU Commission, as opposed to LA which is what is implied in report. (The report suggested a 'Dublin Bay Trust' which was also mentioned in the Guidelines for sustainable use section - comments relating to this will be dealt with in Section 3.6)

Birdwatch Ireland felt that there were significant opportunities to extend or revise environmental designations. A number of suggestions were included in their submission including: robust functioning ecological networks for people and for wildlife should be provided and protected, designated sites should be extended and linked to encourage habitat expansion and mitigation for habitat loss, habitats

should be assessed in terms of whole bay - inner and outer - and in the context of a necklace of wetlands along the east coast of Ireland as well as further inland.

The Richmond Tolka group would like to see the Special Areas of Conservation in the bay expanded to include all areas.

#### **Issue 15: Extension of revision of amenity areas encouraged (10 no.)**

Submissions from a councillor and individuals, would like to see greater access for water based activities and perhaps special protected swimming areas. Submissions in this section welcomed the introduction of management structures to improve amenity into the future.

A Dun Laoghaire Rathdown County Council submission welcomes proposed extensions to Special Amenity Area Orders to enhance Bull Island and Howth.

### **3.5 Coastal Zone Management**

#### **Issue 16: Introduction of Coastal Zone Management is strongly sought and supported (14 no.)**

Several submissions support for the introduction of Coastal Zone Management to Dublin Bay, as proposed in the draft report. The framework in the report was seen as a good first draft.

### **3.6 Guidelines for Sustainable Use**

#### **Issue 17: Strong support for a governance organisation for Dublin Bay: Marine Reserve (26 no.)**

Some 7% of submissions expressed support for the concept of Dublin Bay as a 'National' Marine Park, including members of the public, the Eastern Regional Fisheries Board, public representatives, environmental NGOs and academics.

Submissions from elected representatives in Dublin City Council, Fingal County Council and Dun Laoghaire Rathdown County Council mentioned that the Programme for Government has a commitment for setting up of a Dublin Bay Task Force and to legislate on its recommendations. The Dun Laoghaire Rathdown County Councillor submitted a proposed Dublin Bay Bill published by the Green Party.

The Dublin Regional Authority (DRA) noted that in an effort to address the significant challenges of sustainable development of Dublin Bay there is an urgent need to put in place a structure whose sole function is the sustainable management of Dublin Bay. As the only democratic regional body operating in the area, the DRA should become the overarching body responsible for Dublin Bay.

## Section 4

# Confronting Climate Change

Although a climate change section was included in the study, it was not part of the main focus of the study. As stated on page 15 of the draft report, “climate change mitigation measures, such as barrage and flood defence infrastructure, have intentionally been omitted from the options’ appraisal process because they are addressing different drivers, but they are critically important in the medium to long term future of Dublin City.”

The Confronting Climate Change section of the report was presented to highlight the importance of incorporating responses to important issues such as sea level rise into future planning. The options presented were concepts, which would require much more investigation and study. As noted on page 29 of the draft report, the options presented were ‘imagined’.

Any proposals related to climate change would be subject to detailed study of the hydrodynamics of the bay including impacts on ecology, sediment transport and feasibility modelling.

The reaction of submissions to this section was split between recognition of the importance of beginning the debate on flood protection for Dublin and criticism of the lack of scientific evidence used to create scenarios. The five points below describe the main points identified in the submissions.

### **1. Issues that should be considered in suggesting scenarios**

- Freshwater impoundment would fundamentally affect the saline lagoons and so migrating birds, flora and fauna (Bird Watch).
- Sediment and erosion were issues of concern in many submissions (DEHLG, Eastern Regional Board).
- The Biodiversity Office of Dublin City Council noted that soft-engineering options are preferable from a biodiversity perspective. Soft-engineering options are in line with the Government of Ireland Coastal Protection Code of Practise (1996 Ecopro) and also the draft DCC Climate Change Strategy targets and actions (2007).

The ESB submissions noted two specific items that should be included in any further study of this issue.

- Firstly the construction of a barrage could have significant consequences for the cooling water systems used. Collection in an area of retained water could have negative environmental impacts.
- Secondly, the ESB operate hydro-electric power stations along the River Liffey. Any major developments for flood protection should take account of ‘flood discharges’ from the reservoirs in times of flood.

- The Dudders Angler' club and the Eastern Regional Board noted that barrages, lock gates, closing of the bay will impede the migration of Salmon, Sea Trout and Eels to the rivers running into the bay. It would also affect the amount of food in the bay for fish. Eastern Regional board also highlighted that estuaries provide a natural habitat for the larval and juvenile forms of fish species, in addition to providing shelter and food for many young and adult fish and shellfish. They listed the general division of estuarine fish and noted that these should be especially considered in consideration of Scenario 3 (The conversion of the area inside the bull walls to a freshwater reservoir). There was concern that this could cause flooding along the coast and in inter-tidal areas.
- All 3 scenarios would result in loss in Birds, Cockles and Mussels populations.

## **2. Further Analysis that should be done**

There were many recommendations for future analysis including:

- Sediment deposition and erosion analysis
- Assessment of the ecological impacts of proposed scenarios
- Strategic Environmental Assessment for Dublin Bay.
- Hydrodynamical study, including sediment deposition, flushing (pollution status), hydroperiod. (Dr Robin Edwards of Trinity College Dublin).

## **3. South Bull Island**

Professor James G Wilson, of the Zoology Department, Trinity College Dublin, noted that an artificial South Bull Island would not perform similar functions as the North Bull Island and would likely require substantial and recurrent replenishment to maintain it.

Residents groups were anxious about proposals that included the re-introduction of proposals for an Eastern By-Pass.

## **4. Location of tidal generators flawed**

Many submissions noted that the location of the tidal generators as being inappropriate due to low tidal regime. The tidal generator imagined at Sutton Creek was seen as especially flawed due to the impact it would have on the dynamic spit where sediment accumulation is occurring (and similarly at the proposed South Bull Island).

## **5. Stakeholder engagement on this issue essential**

The ESB wishes to be included in the formulation of any further plans for flood protection.

## Section 5

# Recommendations

With public opinion broadly in favour of further investigation into the possibilities raised by Option 7 of the draft report, and the bulk of stakeholders either ambivalent or in favour of the proposals, the onus remains on Dublin City Council to progress the process, notwithstanding other studies being prepared.

The changing nature of Dublin Bay, and the uncertain future faced by parts of it need to be communicated to citizens in a coherent and non-alarmist manner, while studies are required to consider factors such as hydrological and hydrogeological impact of flood defences being investigated by the City Council's Engineering Department, sediment transport and environmental designations/ ecology of the bay.

A key factor in the discussion should be the identification and assessment of alternative development concepts for the port lands so that the debate can address the positive attributes of such a decision rather than focussing entirely on the problems.

Working with the Department of Transport the future of port trade on the East coast needs to be evaluated and alternative sites to Dublin Port investigated in detail.

When the Department of Transport National Development Plan study is completed, there may be a need to initiate the scoping phase of the Strategic Environmental Assessment process to better understand the wider environmental benefits and issues associated with relocating Dublin Port and to define the environmental objectives.