Alexandra Basin Redevelopment 2

Bringing Dublin Port To 2040

Environmental Impact Assessment Report

Chapter 2 Project Justification

Volume 2



CALAFORT ÁTHA CLIATH
DUBLIN PORT

TETRA TECH

2 Project Justification

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2.1 Introduction

Dublin Port Company (DPC) is a private limited company wholly-owned by the State. Established as a corporate entity in 1997, DPC is responsible for the management, control, operation, and development of the Port. DPC traces its legal origin from the Corporation for the Preserving and Improving of the Port of Dublin Act 1786 to the Dublin Port Act 1867, until the establishment of the modern Company pursuant to the Harbours Act 1996.

Dublin Port is the largest freight and passenger port in Ireland, with all cargo handling activities being carried out by private sector companies operating in intensely competitive markets within the Port. Dublin Port has been identified as a Core Port of international significance in the Trans European Network (TEN-T) Policy as defined by the European Union based on Regulation 1315/2013. It forms part of the European Union's Core Transportation Network and was also designated a Tier 1 Port of national importance in the National Ports Policy 2013 and again in the National Ports Policy 2019.

Dublin Port's large share of national port volumes arises from a combination of two factors, location and depth of water. Dublin Port is a key part of the national port system and DPC seeks to ensure that it plays its role in providing national port capacity. The Dublin Port Masterplan 2040, reviewed in 2018, sets out DPC's vision to transform Dublin Port into a highly land-efficient port and an attractive community resource in its own right, accessible to the people of Dublin and permeable so that Dubliners can enjoy and experience the Port's heritage in all its diversity, from the natural environment, to arts, to local history.

The Dublin Port Masterplan 2040, reviewed in 2018, envisages that the development of Dublin Port to its ultimate capacity will be achieved by three Strategic Infrastructure Development (SID) projects:

1. The Alexandra Basin Redevelopment (ABR) Project, consented in 2015 (PA29N.PA0034);
2. The Masterplan 2 (MP2) Project, consented in 2020 (PA29N.304888); and
3. The Third and Final Masterplan (3FM) Project, submitted in July 2024 and currently under consideration (PA29N.320250).

The ABR Project was the first SID project to be brought forward for planning consent by DPC from the Dublin Port Masterplan 2040. The ABR Project represented the first phase of redevelopment of Dublin Port identified in the Dublin Port Masterplan 2040, reviewed 2018. The ABR Project was granted permission for a period of 10 years from the 8th of July 2015. Due to several factors, including the impacts of the COVID-19 pandemic, the construction phase was not fully completed by the time the permission expired.

The proposed ABR2 Project seeks to complete the previously permitted but unfinished elements of the ABR Project, which were not substantially completed before the expiration of the ABR Project permission in July 2025, and to amend certain elements of the previously permitted ABR Project in light of updated circumstances. DPC is seeking a 10-year permission for the ABR2 Project.

2.2 Context

The ABR Project represented the first phase of redevelopment of Dublin Port identified in the Dublin Port Masterplan 2040. In order to maintain competitiveness and operational efficiencies, DPC must deliver infrastructure to cater for larger vessels within its landholding on the Port Estate. To begin to try and meet this demand, DPC sought and obtained planning permission for the ABR Project, which was designed to:

- Provide for deeper berths to cater for larger vessels;
- Reconfigure existing quays and berths to cater for longer vessels, including the demolition of parts of the quays;
- Provide for new improved quayside infrastructure; and
- Reconfigure landside storage areas and provide some additional areas to cater for increases in the volume of unitised cargo.

A 10-year planning permission was granted for the ABR Project on 8th July 2015 by the Board (PA29N.PA0034), subject to 16 no. conditions. The Board granted permission for the following development:

At Alexandra Basin West:

- The infilling of Graving Dock No.2 (6,055m^2).
- The excavation and restoration of historic Graving Dock No.1.
- The removal of infill material (9,000m^2).
- The relocation of the ore concentrates loading system within Alexandra Basin West.
- The relocation of double deck ramp No.4 to new river berth at Berths Nos. 52/53.
- The demolition of the bulk jetty (3,200m^2).
- The demolition of a section of North Wall Quay Extension (21,700m^2).
- The demolition of five control rooms/buildings/oil bunds (1,715m^2).
- The demolition of a floating ramp on the Liffey side of North Wall Quay Extension.
- The demolition of a Lead-in Jetty at Graving Dock No.2 within the Basin.
- The construction of new quay walls at North Wall Quay Extension (937m in length) including a rounded eastern end using salvaged stone material from demolished sections of quay.
- Moving and reconstruction of existing light house to east end of revised North Wall Quay Extension.

- Extension of Alexandra Quay West (130m in length).
- Rebuilding of existing quay walls in the remainder of the Alexandra Basin West having an aggregate length of 1,200m^2.
- New 273m long Ro-Ro jetty and provision of three Ro-Ro ramps.
- Interpretative glazed pavilions (36m^2) on the west of the reconfigured North Wall Quay Extension and the presentation of a salvaged historic concrete block from the demolished section of the quay.
- The dredging of 470,000m^3 of contaminated material to a depth of -10.0m CD over an area of 194,000m^2 within the redeveloped Alexandra Basin and its subsequent remediation.
- Conservation works to the existing pump house and to retained sections of North Wall Quay Extension.

At Berth 52/53:

- The demolition of existing Berths 52 and 53.
- The demolition of the jetty at Berth 52 (500m^2).
- The demolition of concrete dolphin at Berth 53 (500m^2).
- The construction of a new river berth at Berths 52/53 (300m long).
- The construction of a new 75m mooring jetty at new river berth.
- The construction of a new 40m long mooring jetty to extend the existing Berth 49 (50m long).
- The infilling of the Terminal 5 Ro-Ro basin (45,650m^2).
- The raising of existing levels by an average of 1.4m over an area of 95,000m^2.
- Dredging of new river berth to -10m CD.

Within the Navigation Channel:

- Construction of a marina protection structure to a height of +7.0m CD and a length of 220m on the south side of the river channel.
- Dredging of the shipping channel to a depth of -10m CD from a point 55m to the East of the East Link Bridge to a location in the vicinity of Dublin Bay a total distance of 10,320m.

In order to implement the planning permission a number of other consents were also required for the ABR Project, including:

- Foreshore Licence/Lease: DPC submitted a Foreshore Licence/Lease Application for the ABR Project to the Department of Environment, Community and Local Government (DECLG) on

13th July 2015. A foreshore licence/lease was granted in September 2016 as well as consent under Section 10 of the Foreshore Act, 1993, as amended.

- Industrial Emissions Directive Licence: Following the grant of planning permission from the Board on 8th July 2015, DPC also submitted an Industrial Emissions (IE) Directive Licence Application for the ABR Project to the EPA on 17th July 2015. The EPA granted an IE Licence to DPC on 29th November 2016.
- Dumping at Sea Permit: DPC was granted a Dumping at Sea Permit (S0024-01) by the EPA on 13th September 2016 for the loading and dumping at sea of dredged material arising from capital dredging of the Liffey Estuary Lower and Dublin Bay.

Once these additional consents were in place, works commenced in Q4 2016, pursuant to the planning permission granted by the Board.

2.2.1 Expiry of the ABR Project

The ABR Project was granted permission for a period of 10 years from the 8th of July 2015, however, due to several factors, including the impact of the COVID-19 pandemic; procurement difficulties associated with contractor award; and the time required to secure other statutory consents enabling development, the construction phase was not fully completed in accordance with the plans and particulars submitted.

In addition, since the ABR Project was granted planning permission, DPC also secured planning permission for the MP2 Project in July 2020. The MP2 Project, as permitted, amended elements of the ABR Project with respect to the alignment of Riverside Berth 52 to allow for the insertion and alignment of a new Riverside Berth 53.

As such, the following work elements have not been completed or have since been amended by the consented MP2 Project:

At Alexandra Basin West:

- The excavation and restoration of historic Graving Dock No.1.
- The demolition of a section of the North Wall Quay Extension (21,700m^2).
- The demolition of a floating ramp on the Liffey side of the North Wall Quay Extension.
- The construction of new quay walls at the North Wall Quay Extension (937m in length) including a rounded eastern end using salvaged stone material from demolished sections of quay.
- Moving and reconstruction of existing light house to east end of the revised North Wall Quay Extension.

- Rebuilding of existing quay walls in the remainder of Alexandra Basin West having an aggregate length of 1,200m^2.
- Interpretative glazed pavilions (36m^2) on the west of the reconfigured North Wall Quay Extension and the presentation of a salvaged historic concrete block from the demolished section of the quay.
- The dredging of 470,000m^3 of contaminated material to a depth of -10.0m CD over an area of 194,000m^2 within the redeveloped Alexandra Basin and its subsequent remediation.

At Berth 52/53:

- The demolition of existing Berths 52 and 53.
- The demolition of the jetty at Berth 52 (500m^2).
- The construction of a new riverside berth at Berths 52/53 (300m long).
- The construction of a new 75m mooring jetty at new riverside berth.
- The construction of a new 40m long mooring jetty to extend the existing Berth 49 (50m long).
- The infilling of the Terminal 5 Ro-Ro basin (45,650m^2).
- The raising of existing levels by 1.4m over an area of 95,000m^2.
- Dredging of new river berth to -10m CD.

Within the Navigation Channel:

- Construction of a marina protection structure to a height of +7.0m CD and a length of 220m on the south side of the river channel.

2.2.2 Section 146B Submission

An application under Section 146B of the Planning and Development Act, 2000 (as amended) (ABP-322353-25) was made on 15th April 2025 regarding the position of the uncompleted works permitted under the ABR Project. This Section 146B application sought to alter the terms of the development so as to omit aspects of the permitted development related to the North Wall Quay Extension. Following a series of public consultation exercises in late 2019 and early 2020, which were informed by a discussion document and an economic cost-benefit analysis study, DPC concluded that it would no longer be viable to proceed with the permitted works at the North Wall Quay Extension. DPC would instead continue to provide capacity for cruise ships in Dublin Port at existing multi-purpose berths.

The Commission determined by way of Commission Order ABP-322353-25 dated 18th July 2025 that these proposed alterations would not be material and duly altered the terms of the grant of the permission in accordance with the plans and particular submitted with the amendment application.

In this regard, the following aspects of the ABR Project are now omitted:

- Construction of interpretive glazed pavilions having an area of 36m^2 on the west of the reconfigured North Wall Quay Extension and the presentation of a salvaged historic concrete block from the demolished section of quay.
- Dredging to -10m CD c.276,000m^2 at the North Wall Quay Extension berthing pocket.
- Construction of new quay walls at the North Wall Quay Extension, 937m total in length, including a rounded eastern end using salvaged stone material from demolished sections of quay.
- Demolition of a floating ramp (Ramp no. 6) on the Liffey side of the North Wall Quay Extension.
- Demolition of a section of the North Wall Quay Extension (a Protected Structure) having an area of 21,700m^2.
- Moving and reconstruction of existing lighthouse to eastern end of the revised North Wall Quay Extension.
- Construction of marina protection structure to a height of +7.0m CD and a length of 220m on the southern side of the river channel.

In addition to the above permitted amendments to the ABR permission, DPC has made a decision to postpone the proposed excavation and restoration of Graving Dock No. 1. Given the pressures on DPC from stakeholders/tenants to retain hard standing in areas close to the berth to facilitate the growth in volume of containers and dry goods between Ireland, the UK and mainland Europe the hard standing area on top of Graving Dock No. 1 is, as matters stand, indispensable to the operation of the Port. Graving Dock No. 1 remains preserved and protected under ground, and it is hoped that it may be excavated at a later stage under a specific grant of permission.

2.2.3 The ABR2 Project

The proposed ABR2 Project seeks to complete the required elements of the ABR Project, which were not substantially completed before the expiration of the permission in July 2025. A new grant of planning permission is being sought to reauthorise those aspects of the permitted ABR Project under Section 291 of the Planning and Development Act 2000 as the ABR2 Project.

The ABR2 Project has two key elements:

1. Alexandra Basin West: Completion of dredging within Alexandra Basin West, with dredging of remaining 334,000m^3 of contaminated material to a depth of -10.0m CD over an area of 194,000m^2 within the redeveloped Alexandra Basin West and its subsequent remediation.
2. Berth 52/53 Basin: Demolition of existing marine infrastructure prior to infilling of the Berth 52/53 (Terminal 5) basin of an area of 45,650m^2 and the raising of existing levels by 1.4m over an area of 95,000m^2. These infilling and level-raising works are a fundamental prerequisite for delivery of the Unified Ferry Terminal permitted under the MP2 Project.

As further detailed in **Chapter 3 Section 3.6** a pre-application meeting was held with An Coimisiún Pleanála (the Commission) on the 5th of February 2026 to discuss the proposed ABR2 Project. Information on the permitted alterations to the original planning permission for the ABR Project (Ref. PL 29N.PA0034) were also discussed at this meeting.

The works proposed under the ABR2 Project are within the terrestrial and nearshore areas as defined in the Planning and Development Act 2000. The proposed area for dredging works exceeds five hectares and also falls within the scope Class 11(b) of the Eighth Schedule of the Planning and Development Act 2000 ("the 2000 Act") within Classes of Development specified for purposes of Chapter III of Part XXI "Other Development in the Maritime Area". Class 11(b) refers to the following;

11. Development consisting of—
(b) the extraction of stone, gravel, sand or clay by marine dredging (other than maintenance dredging), where the area of extraction would be greater than 5 hectares.
The works at Terminal 5 also falls within the scope Class 21 (b) of the 2000 Act. Class 21(b) refers to the following;
21. A harbour or port installation, including –
(b) vehicle queuing and parking areas,

As a result, it is clear that the proposed ABR2 Project constitutes development to which Chapter III of the 2000 Act applies. Section 286 of the Planning and Development Act 2000 refers to the *"obligation to obtain permission to carry out development"* to which Chapter III applies. Section 286(3) states the following;

Subject to sections 287(4) and 304, a person shall not be eligible to apply for permission to carry out development to which this Chapter applies unless that person—

(a) is the holder of—

> *(i) a maritime area consent granted for the occupation of a maritime site for the purposes of the proposed development, or*
>
> *(ii) a licence granted under section 3 of the Act of 1933 authorising the licensee to do any act or acts referred to in that section for the purpose of the development on, or in relation to, the maritime site in which the development is proposed to be situated,*

(b) is the owner of land in the maritime area on which it is proposed to carry out the development concerned,

(c) is the lessee under a lease—

> *(i) made under section 2 of the Act of 1933, of a part of the foreshore that consists of, or includes, the maritime site on which it is proposed to carry out the development concerned, and*

(ii) that contains a covenant, condition or agreement, to which subsection (4) of the said section 2 applies, requiring the lessee to carry out, on that maritime site, the proposed development concerned, or

(d) makes the application with the consent, or on behalf, of the owner of land in the maritime area on which it is proposed to carry out the development concerned.

The Act of 1933 which is referred to in Section 286(3)(a)(ii) relates to the Foreshore Act 1933. Section 3 of the Act of 1933 refers to the power for Minister to grant licences of foreshore. Therefore, having regard to the above, if the Applicant is the holder of a Foreshore Licence no requirement to obtain Maritime Area Consent (MAC) arises under Section 286(3)(a)(i). The Foreshore Licence (FS005699) granted to DPC in 2016 included consent for capital dredging and works within Alexandra Basin West and Berths 52/53 under the Section 10(1) of the Foreshore Act 1933 as permitted in respect the ABR project. That Foreshore Licence continues to have legal effect.

2.3 Statement of Need

As noted previously, the ABR Project was the first major infrastructure project to be brought for planning from DPC's Masterplan 2012 to 2040. The Masterplan recognises the need to provide capacity in the Port to cater for 60 million gross tonnes of cargo by 2040 and was approved by the Board of DPC in February 2012. It was also subsequently endorsed by Government in its National Ports Policy 2013 in the following terms:

"The government endorses the core principles underpinning the company's Masterplan, and the continued commercial development of Dublin Port Company is a key strategic objective of National Ports Policy".

The ABR Project emanated from ideas presented in the Masterplan and its design was based on an in-depth evaluation of needs (supported by detailed modelling and simulation studies) and a determination of the potential environmental impact of the proposed development during the Environmental Impact Assessment (EIA) process. The ABR Project complemented recent and continuing initiatives by DPC to, in some cases, regain operational control over port lands and, more generally, to influence port operators to increase the efficiency of their utilisation of port lands. These initiatives have been included within DPC's policies regarding the use of port lands and appropriate targets for their utilisation for different types of cargo. In identifying the engineering options in the Masterplan, DPC recognised significant levels of public concern about the expansion of the Port through further infill in Dublin Bay. The Masterplan confirmed that DPC would continue to develop the Port within its current footprint to the maximum extent possible before any major reclamation works might be considered. The ABR Project, therefore, focused on a combination of re-developing existing (and in some cases life-expired) infrastructure and using existing port lands at higher utilisation levels.

The MP2 Project complements the ABR Project in providing capacity for growth on the north side of the Port and at its eastern end. The MP2 Project amended the orientation of the proposed river-side berth, to accommodate larger vessels both for Ro-Ro ferries and for Lo-Lo container ships.

The proposed ABR2 Project will allow the completion of these redevelopment works and does not seek to expand any further redevelopment works beyond those originally permitted under the ABR Project and the complementary MP2 Project.

2.3.1 The ABR Project and ABR2 Project Need

The need for the ABR Project (and by corollary the ABR2 Project) arose for a number of reasons:

1. Dublin Port needs to make timely provision for the anticipated growth in volumes of both cargo and passengers.
2. Dublin, as the centre of national economic activity and given the regional connectivity afforded by the road and rail network, is the preferred location for the providers of shipping services to operate to and from.
3. Dublin Port needs to prepare for increases in ship sizes and the changing operational preferences of the providers of shipping services. The Port also needs to be able to cater for a large increase in the number of ship arrivals each day.
4. Dublin Port needs to re-configure port operations to best meet future capacity requirements without additional infill beyond the existing port boundaries
5. Existing infrastructure is approaching the end of its useful life and needs to be renewed / replaced.
6. Undertaking the works in Alexandra Basin West will allow DPC to take steps to address a legacy contamination issue in the basin which restricts DPC's ability to carry out routine and essential maintenance dredging operations.

The need for the ABR2 Project arises to complete the objectives of the (now expired) ABR Project as well as those objectives of the (ongoing) MP2 Project. The ABR2 Project has been carefully designed to ensure that:

- It is consistent with the Dublin Port Masterplan 2040;
- The project makes optimum use of the Port's finite resources of river berths and quayside lands;
- The project can be constructed in a way that minimises the impact on existing port operations;
- DPC can take steps to address a legacy contamination issue within Alexandra Basin West which restricts DPC's ability to carry out routine and essential maintenance dredging operations;

- The project reflects and responds to recent and up-to-date environmental information to consider the potential impact of different options;
- The project best meets all environmental requirements and minimises the potential impact of the proposed development on the environment as much as possible; and
- The project is consistent with the principles of proper planning and sustainable development.

2.3.2 Future-proofing Dublin Port

The ABR Project was, to a large extent, a re-engineering of port infrastructure built between the late Victorian period and the 1960s. The engineering works permitted under the project were on berths that were previously in use. This made the project challenging in its implementation. Moreover, it was built at a time of growing volumes. Having seen the Port's volumes decline by 9.5% between the peak of 2007 (30.9 million gross tonnes) and 2012 (28.0 million gross tonnes), volumes began to increase again and were up by 3.0% to 28.8m tonnes in 2013. In 2025, the throughput of Dublin Port had increased to 35.2 million tonnes – an increase of 25% on the 2012 tonnage volume. DPC was, therefore, challenged to complete the proposed works before volumes grew to the extent that works could not have been carried out without disrupting the businesses of the Port's customers and damaging the wider economy.

Against this background, some of the elements of the ABR Project were intended to deal with current demand and operational requirements while also future-proofing the Port by providing the capacity to further deepen berths in future years as and when required to meet market demand. In particular, it was planned as a key part of the ABR Project that the major disruption in port activity resulting from large civil engineering works would occur on a phased basis in a way that would not result in major disruption to the movement of cargo (both import and export) through the Port. The operational efficiency of the Port was enhanced by the ABR Project through making many of the berths suitable for different types of ships and cargo and this has contributed to the maximisation of infrastructure utilisation. The ABR2 Project will help to support the larger SID plans of the MP2 and 3FM Projects within Dublin Port to ensure that the Port is future-proofed in as thorough manner as possible given its geographic constraints.

2.4 Project Rationale

The ABR Project focussed largely on re-engineering port infrastructure to address projected demand while allowing for future berth deepening to meet market needs. Similarly, the MP2 Project at the eastern end of the North Estate aims to improve operational efficiency and maximise infrastructure use by accommodating a range of vessel and cargo types. To prevent wider constraints in the national economy, the capacity of Dublin Port must remain ahead of demand. The Issues Paper on the Review of National Ports Policy 2013 (Department of Transport, October 2023) noted that:

"Failure to proceed with investment in capacity, infrastructure, equipment and hinterland connectivity poses serious risks to the future success of Ireland's ports and national economy" (page 18).

The Port Capacity Study (IMDO 2023) suggested that any failure to maintain sufficient port capacity could have a major negative impact on the national economy, starving it of the materials needed to continue strong growth. The Study further expressly states that Ireland should have sufficient port capacity for all cargo modes if planned developments are put in place in time.

The ABR2 Project is one such planned development. The implementation of the ABR2 Project will allow access of deeper draughted vessels into Alexandra Basin West, and maximising utilisation of existing infrastructure. The ABR2 Project, and in particular the infilling proposed at Berths 52/53, is a necessary prerequisite to allow for the development of the Unified Ferry Terminal, a core component of the SID permission granted in respect of MP2, which will cater for Ro-Ro vessels of up to 240m length. In the absence of the ABR2 Project, it will not be possible to develop the Unified Ferry Terminal, and thus the completion of the MP2 Project would be frustrated. These development works are recognised as a central element of the plans for the maximisation of the capacity at the port since the publication of the original Dublin Port Masterplan in 2012, followed by the updated Masterplan after its subsequent review.

2.4.1 Policy Basis

The ABR2 Project forms part of the targeted investment in infrastructure required to fulfil Dublin Port's critical function as part of the **EU TEN-T core network,** which has been further recognised and confirmed in the **National Ports Policy** (NPP) where Dublin Port is designated as a Port of National Significance (Tier 1). Since 2016 those policies have been updated, however the role and function of Dublin Port as set out in the NPP remains unchanged.

The NPP endorses Dublin Port's published Masterplan, which sets out the programme of development over 30 years from 2012-2040. The NPP "*endorses the core principles underpinning the company's Masterplan and the continued commercial development of Dublin Port Company is a key strategic objective of National Ports Policy".* It is Government's position, as expressed in the NPP, that those ports considered to be of national significance be capable of the type of port capacity required to ensure continued access to both regional and global markets for our trading economy.

The Draft National Ports Policy (DNPP) published in July 2026 continues to designate Dublin Port as a Port of National Significance, along with other ports, with the Government cognisant of the need to invest in our ports. Particularly, with regard to post-2040 capacity, the DNPP states that renewed focus is required by all commercial State ports to maximise the utilisation of existing port assets and plan for their continued growth. The DNPP notes the requirement for revised master planning to drive regional growth, support development of offshore renewable energy developments, and capture the additional growth in post-2040 trade, particularly on the east coast. Project Ireland 2040 notes that by 2040, there is projected to be approximately one million additional people living in Ireland[1]. This population growth will require new jobs, new homes, heightened cultural, and social amenities, enhanced regional connectivity and improved environmental sustainability. **Project Ireland 2040**, which replaced the

[1] https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf

National Spatial Strategy, sets out to deliver these through the **National Planning Framework** (NPF), the **National Development Plan 2021-2030** (NDP) and the **National Marine Planning Framework** (NMPF). These frameworks acknowledge, recognise and support the role and function of designated ports and infrastructure needs.

The **Regional Spatial and Economic Strategy** (RSES) for the Eastern and Midland Region including the **Metropolitan Area Spatial Plan** (MASP) for Dublin was published in June 2019 by the Eastern and Midland Region Assembly (EMRA). Prepared in accordance with the NPF, the RSES is a strategic plan and investment framework to shape the future development of the region to 2031 and beyond. With respect to the profile of the region the RSES notes that the Dublin region is the main global gateway to Ireland. The RSES states that as Ireland's only international city of scale, Dublin acts as the global gateway to Ireland and its influence extends well beyond its administrative boundaries. The RSES recognises that Ireland's port and shipping services play an important role as enablers of economic growth, noting that the region is home to the largest sea port in the country, Dublin Port. In terms of port facilities, the RSES acknowledges the NPP and the long-term international trend in ports and shipping towards increased consolidation of resources in order to achieve optimum efficiencies of scale. It notes that this has knock-on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections.

The **Transport Strategy for the Greater Dublin Area, 2022 to 2042** has been developed to be consistent with the spatial planning policies and objectives set out in the RSES. These objectives in turn are consistent with the NPF and the NDP as set out in Project Ireland 2040. This strategy is also based on national policies on sustainability as set out in climate action and low carbon legislation, and in climate action plans.

The **Dublin City Development Plan 2022-2028** (the Development Plan) is the primary statutory land-use planning policy document guiding development within Dublin City. Dublin Port is wholly situated within the boundaries of Dublin City. The Development Plan is emphatically supportive of the role that Dublin Port plays in the city and the country. Chapter 4 – Shape and Structure of the City under Section 4.5.1 (Approach to the Inner City and Docklands) of the Development Plan recognises and outlines general support for the activities of Dublin Port stating that *"Dublin City Council fully supports and recognises the important national and regional role of Dublin Port in the economic life of the region and the consequent need in economic competitiveness and employment terms to facilitate port activities. Dublin Port will have a significant role to play in the future development and growth of the city and it is considered prudent to plan the structure of this part of the city, including the proposed public transport network, to fully integrate with the developing city structure and character, while having regard to the Dublin Port Company Masterplan 2012-2040."*

The Development Plan states that is the policy SC7of DCC *"To support and recognise the important national and regional role of Dublin Port in the economic life of the city and region and to facilitate port activities and development, having regard to the Dublin Port Masterplan 2040."* In Chapter 6 which sets out policy for the City Economic and Enterprise, the Development Plan acknowledges that *"Dublin Port*

continues to modernise and consolidate its operations with the company making considerable infrastructural investment at the port to facilitate larger vessels and provide for increased capacity" and *"is a major transport and logistics hub with Dublin Port providing a direct trading route to the UK and Continental Europe*".

The Development Plan acknowledges that as Ireland is an export-driven economy on the periphery of Europe the transport and logistics sector is a significant and growing sector in Dublin. The Development Plan further notes that logistics and storage is expected to be the fastest growing employment sector in Dublin over the coming decade. In this regard, Dublin Port is recognised as being a particularly important element of the city's transportation and logistics infrastructure and continues to play a significant role in the economy of the city, handling almost half of all the State's trade and is a key strategic access point for Ireland and the Dublin area.

The Development Plan notes the Dublin Port Company Masterplan and important role that Dublin Port will continue to play in the future development and growth of the city. The Development Plan acknowledges the Masterplan and one of its overall objectives to reintegrate the Port with the city and to create a unique fusion between the working port and the living city through the creation of high-quality spaces. This is confirmed by Policy CEE35 which states it is the policy of Dublin City Council *"To recognise that Dublin Port is a key economic resource and to have regard to the policies and objectives of the Dublin Port Masterplan 2040 including the reintegration of the Port with the City."*

These key strategic policies and objectives of DCC endorse the improvement of port infrastructure required to facilitate economic growth in a manner which will also safeguard the natural and built environment.

2.4.2 The Dublin Port Masterplan 2040

The **Dublin Port Masterplan 2040** is a key document guiding future development within the port up to 2040. The Masterplan is a non-statutory plan which has been framed within the context of EU, national, regional and local development plan policies and is explicitly endorsed (or is expressly recognised) in the NPP, NPF, NMPF, NDP, RSES for the Eastern and Midland Region and the Development Plan regulating development. It presents a vision for future operations at the port and critically examines how the existing land use at Dublin Port can be optimised for merchandise trade and passengers (including cruise ships). The Masterplan was prepared by DPC in order to:

- Plan for future sustainable growth and changes in seaborne trade in goods and passenger movements to and from Ireland and the Dublin Region in particular;
- Provide an overall context for future investment decisions;
- Reflect and provide for current National and Regional Guidelines and initiatives;
- Ensure there is harmony and synergy between the plans for the Port and those for Dublin City, the Dublin Docklands Area and neighbouring counties within the Dublin Region; and

- Give some certainty to customers about how the Port will develop in the future to meet those requirements.

Since the Masterplan was published in 2012, Dublin Port has experienced particularly high rates of trading growth and traffic growth with volumes on an increasing trajectory. In light of the high level of growth, a review of the Masterplan took place in 2017-2018. The review concluded that an eastern expansion of Dublin Port into Dublin Bay was no longer viable and should no longer be pursued as an option. Therefore, DPC must optimise its existing envelope to meet anticipated capacity requirements on the basis of an increased average annual volume growth to 2040.

There has been a long-term trend of relentless growth in Dublin Port's volumes. Although the forecasting of long-term port demand is not an absolute science, given that it is inherently linked to forecasting national economic performance and population growth, the throughput capacities in the Masterplan 2040 are based on the objective, data-based projection that cargo volumes will continue to grow to 2040, as they have done over many decades.

The core assumption in the Masterplan is that the average annual rate of growth over the 30 years from 2010 to 2040 will be 3.3%, bringing Dublin Port's throughput to 77.2 million gross tonnes. This averaged annual growth rate of 3.3% compares to rates of growth over the two preceding 30-year periods period between 1950-1980 and 1980-2010 of 3.2% and 4.7% respectively (Table 2 1).

Table 2-1: Dublin Port's, historical and projected growth rates over 30-year periods (1950 to 2040) and growth over 20 periods (1980 to 2040)

Up to Year	30 Year Annual Growth Rate
1980	3.2%
2010	4.7%
2040	3.3%

Year	Gross Tonnes	Growth over Previous 20 Years
1980	7.9m	x 2.3
2000	21.0m	x 2.6
2020	36.9m	x 1.8
2040	77.2m	x 2.1

It takes in the order of twenty years to bring major port infrastructure from the concept stage to completion and **Table 2-1** shows that cargo volumes in each of the twenty-year periods to 2020 have roughly doubled. The Masterplan assumption of 3.3% growth per annum implies that volumes will double again in the twenty years to 2040. The main driver for past growth in Dublin Port's cargo volumes has been population increase and economic growth. Between 1950 and 1980, the population increased from 3.0 million to 3.4 million. In the thirty years to 2010, it increased further to 4.6 million. By 2020, it had reached 5.0 million. As of 2025 the CSO[2] estimates that the population of the State is approximately 5.46 million and the CSO predicts that there will be substantial increases to 2040 and beyond as shown in **Table 2-2**.

DPC has adjusted its 2040 capacity forecast downwards compared to the Masterplan, due to the projected permanent loss of port lands to State Services as a consequence of the construction of physical infrastructure required to be put in place for necessary customs and border checks in light of the United Kingdom's exit from the European Union. Taking account of this impact, DPC estimates that the port capacity in 2040 will now be 73.8m gross tonnes – assuming all components of the Masterplan, including the ABR2 Project, are delivered.

Table 2-2: Population Estimates 1950 to 2025 and population projections from 2031 to 2042 ('000), (CSO, 2025)

Year	Estimate	Projection	
		Minimum	Maximum
1950	*2,969*	-	-
1960	2,832	-	-
1970	2,950	-	-
1980	3,401	-	-
1990	3,506	-	-
2000	3,790	-	-
2010	4,555	-	-
2020	4,977	-	-
2025	5,458		
2042	-	5,771	6,396

[2] https://www.cso.ie/en/releasesandpublications/ep/p-pme/populationandmigrationestimatesapril2025/

For its part, the NPF assumes that the population will increase to 5.7 million by 2040. As a consequence of the high level of persistent underlying growth, major economic disruptions such as the 2008 financial crisis, Brexit, Covid-19, and Russia's invasion of Ukraine, manifest themselves as aberrations on the long-term growth curve (**Figure 2-1**). The primary long-term impact of Brexit on Dublin Port has been the loss of port lands which have been allocated to the State authorities for customs and border checks – representing a permanent loss of capacity.

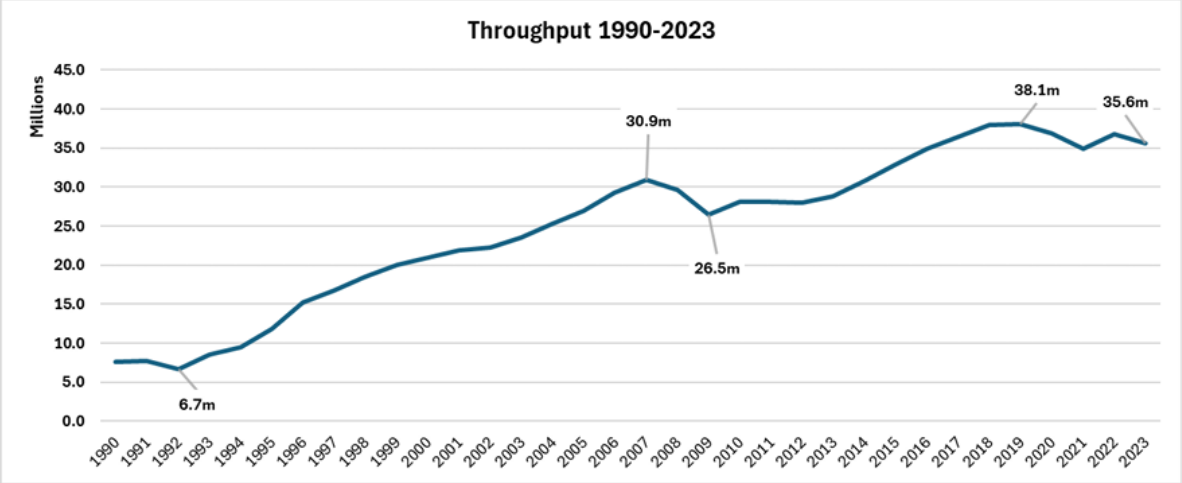


Figure 2-1: Trends in Dublin Port's cargo volumes (m Tonnes), 1990 to 2023

DPC's approach in Masterplan 2040 is to maximise the throughput on Dublin Port's fixed brownfield land area before seeking to develop additional port capacity at another east coast location. DPC has published the detailed thinking behind this approach in the Dublin Port Post 2040 Dialogue. This analysis beyond 2040 reinforces the need to complete the development of Dublin Port as envisaged in Masterplan 2040 by the ABR2 Project.

In addition to projected growth in throughput, DPC needs to cater for ongoing increases in vessel size. The depth of the channel is now maintained at a depth of -10m CD, allowing ships with draughts of up to 9.7m enter the port at any stage of the tide on most days of the year (with no tidal restriction), however the capacity for Alexandra Basin West to cater for deeper draughted vessels is restricted by the depth at the berths within this basin.

With the ongoing increase in vessel sizes for all traffic modes, Dublin Port will need to increase its berthing pocket depths within Alexandra Basin West to accommodate these vessels. The ABR2 Project remains consistent with prevailing planning policy and with the objectives of the TEN-T network for the North Sea-Mediterranean Corridor and designated role of Dublin Port.

2.4.3 Cargo Volumes and Dublin Port's Masterplan

There has been a long-term trend of relentless growth in Dublin Port's volumes. In the 30 years to 1980, the volume of goods handled in Dublin Port increased at an average rate of 3.2% per annum. In the

following 30 years to 2010, the level of growth increased to 4.6%. Trading patterns in Dublin Port, supported by economic analysis carried out for DPC, indicates that growth will continue in the future albeit at a lower long-term rate. In particular, DPC believes that a rate of 2.5% per annum in the 30 years to 2040 is realistically achievable.

It is believed that growth will not be the same across all modes but that some modes will grow more strongly than others. In DPC's Masterplan it is envisaged (and supported by expert analysis) that the average annual growth of 2.5% would be spread across the different cargo modes as shown in **Table 2-3**.

Table 2-3: Masterplan growth predictions 2010 – 2040

'000 gross tonnes (five-year rolling average)	2010	2040	Average Annual Growth Rate
Ro-Ro	16,403	41,920	3.2%
Lo-Lo	6,317	10,480	1.7%
Bulk Liquid	4,009	4,000	0.0%
Bulk Solid	2,054	3,500	1.8%
Break Bulk	96	100	0.1%
Total Tonnes	**28,879**	**60,000**	**2.5%**
Unitised	***22,720***	***52,400***	***2.8%***
Non-unitised	***6,159***	***7,600***	***0.7%***
Unitisied ('000 units)	**2010**	**2040**	**Average Annual Growth Rate**
Ro-Ro	701	1,791	3.2%
Lo-Lo	377	625	1.7%
Totals	**1,078**	**2,416**	**2.7%**
Lo-Lo ('000 Twenty-Foot Equivalent UNI (TEU))	**2010**	**2040**	**Average Annual Growth Rate**
Lo-Lo	641	1,063	1.7%

In particular, DPC believes that the Port's unitised business (Ro-Ro and Lo-Lo) will grow at a faster rate (2.8%) than its non-unitised business, primarily bulk liquid and bulk solid commodities (0.7%). As a result of this differential, unitised cargoes will account for 87.3% of total cargo by 2040 compared to 78.7% in 2010. Moreover, within the unitised category, DPC believes that Ro-Ro will grow faster (3.2%) than Lo-Lo (1.7%).

2.4.4 Logic of DPC's volume projections to 2040

The underlying justification for the proposed ABR2 Project is the requirement for DPC to cater for future growth in cargo volumes through Dublin Port. In this section, the continuing reasonableness of the Masterplan's long-term growth assumptions is assessed by reference to a number of factors:

- Trends in the early years of the Masterplan.
- Impact of the recession in the early years of the Masterplan's 30-year planning period.
- Comparison with growth trends in the years since 1990.
- The long-term relationship between cargo volumes and economic growth.
- The comparison of project cargo volumes with population growth projections.
- The impact of actual growth being different in future years to that assumed in the Masterplan.

2.4.5 Maximising the Utilisation of Port Infrastructure and Landside Access Connections

The physical infrastructure to be provided by the ABR2 Project and by other Masterplan projects will only provide the capacity required by the Masterplan 2040 if it can operate without capacity constraints being reached. This requires complementary measures in three areas:

- Land utilisation in Dublin Port.
- Landside access.
- Inland port facilities.

2.4.5.1 Land utilisation

As stated earlier, DPC's approach to the development of Dublin Port is founded upon a commitment to proper planning and sustainable development. This extends to the view that the utilisation of existing brownfield port lands should be maximised before additional port capacity is developed at a greenfield location elsewhere on the east coast of Ireland. The footprint of Dublin Port is fixed by the commitment in the Masterplan 2040 not to expand the 260ha land area of the port by any further infill into Dublin Bay. Taken together with the port capacity target of 73.78[3] million gross tonnes per annum by 2040,

[3] This equates to the Masterplan 2040 target of 77.16m Tonnes, but reduced by 3.38m Tonnes to allow for the assumed permanent loss of 7 hectares of freight yards to state Brexit facilities.

this sets an objective to attain a throughput of 290,000 gross tonnes per hectare per annum. This is twice the land utilisation achieved in 2019.

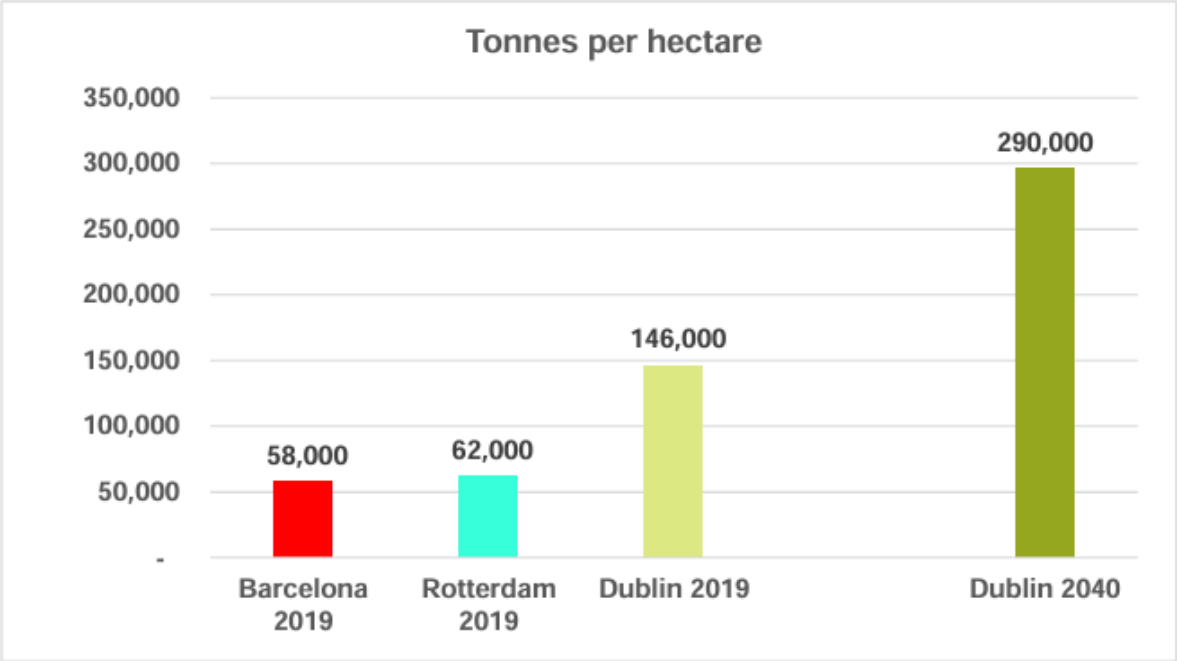


Figure 2-2: Port land utilisation comparison

To put this into perspective, **Figure 2-2** shows the land utilisation achieved (gross tonnes per hectare per annum) in the multi-modal ports of Barcelona (58,000) and in Rotterdam (62,000) in 2019. Whereas a doubling in land utilisation to 290,000 gross tonnes per hectare per annum over a period of 20 years is an ambitious target, there are impressive benchmarks in ports elsewhere which suggest that what is proposed is feasible. For example:

- The Port of Dover attained a land utilisation of 1.2 million gross tonnes per hectare in 2019 due to the very high proportion of Ro-Ro freight that was accompanied.
- In Valparaiso in Chile, TPS attained 1.0 million gross tonnes per hectare in 2019 in its container terminal.

These various comparisons – with Barcelona, Rotterdam, Dover and Valparaiso – show, on the one hand, that DPC's land utilisation targets are ambitious but, on the other, that they are attainable. Given that the land area of Dublin Port is fixed, the faster cargo moves through the port, the greater its capacity. If Dublin Port's ambitious land utilisation targets are to be achieved, then the dwell times of trailers and containers need to be reduced. This reduction will be driven by changes in operation of logistics chains and a gradual shift to 24/7 operation. We also anticipate further development of inland ports, primarily by the private sector. DPC recognises that the intensification of land utilisation identified above can only be achieved in circumstances where the developments required to achieve these targets accord with the principles of proper planning and sustainable development. The ABR2 Project Planning Application is supported by detailed environmental assessments of the impacts of the

proposed development to address how impacts can be avoided or effectively mitigated. In general, terminals in Dublin Port have historically provided too much free or low-cost storage for trailers and containers. This is an inefficiency which supply chain operators benefit from without cost to them. However, since DPC published the Franchise Policy in 2014 and, following the initial developments at Dublin Inland Port, DPC has begun to introduce more stringent regimes in certain terminals in Dublin Port, with implementation of a significant reduction in free periods for containers and trailers in 2020. Dublin Port recognises the critical importance of ensuring that port lands are being fully utilised by encouraging the faster movement of unitised product through the port. Reducing dwell times will remain an important aspect of this initiative and already two Lo-Lo operators in the Port have implemented strict dwell time controls with free periods for import trailers reduced down to four days. The ambition is to reduce these dwell times further for all unitised operations in the port from four days, then to three, and eventually to two days. Cargo that remains past these periods will face a significant escalation of charges. Over the coming years, DPC will continue to use economic measures to change the behaviour of supply chain operators to increase the effective capacity of Dublin Port's unitised terminals. This approach has worked elsewhere, is beginning to work in Dublin Port and will, in time, allow the land utilisation targets of the Franchise Policy to be achieved or exceeded

- Ro-Ro: 20,000 unaccompanied units per hectare per annum; and
- Lo-Lo: 40,000 TEU per hectare per annum.

One of the direct consequences of Brexit has been a reduction in the percentage of accompanied Ro-Ro trailers and an increase in the percentage of unaccompanied ones, putting increasing pressure on freight transit yard areas.

2.4.5.2 Landside access

There are four potential capacity limits for any port:

- Channel;
- Berths;
- Land area; and
- Access.

In the case of berths and land area, the development options in Masterplan 2040 are sufficient to meet the target capacity required by 2040 of 73.78 million gross tonnes per annum, 90% of which is accounted for by the 3.0 million trailers and containers in the unitised modes of Ro-Ro and Lo-Lo.

The final factor which could limit Dublin Port's throughput capacity is land access. Dublin Port is rail-connected, but at present 99% of all freight moves in and out of the Port by HGV. In 2022, Dublin Port, undertook an extensive Origin-Destination survey of freight movements to and from the port. This involved surveying c.35% of all HGVs and was an update on previous surveys conducted in 2001 and 2011 (**Figure 2-3**). Key findings were:

- 73% of the Port's HGVs have an origin or destination within 90km of Dublin Port; and
- 61% of the HGVs have an origin or destination within 40km of Dublin Port.

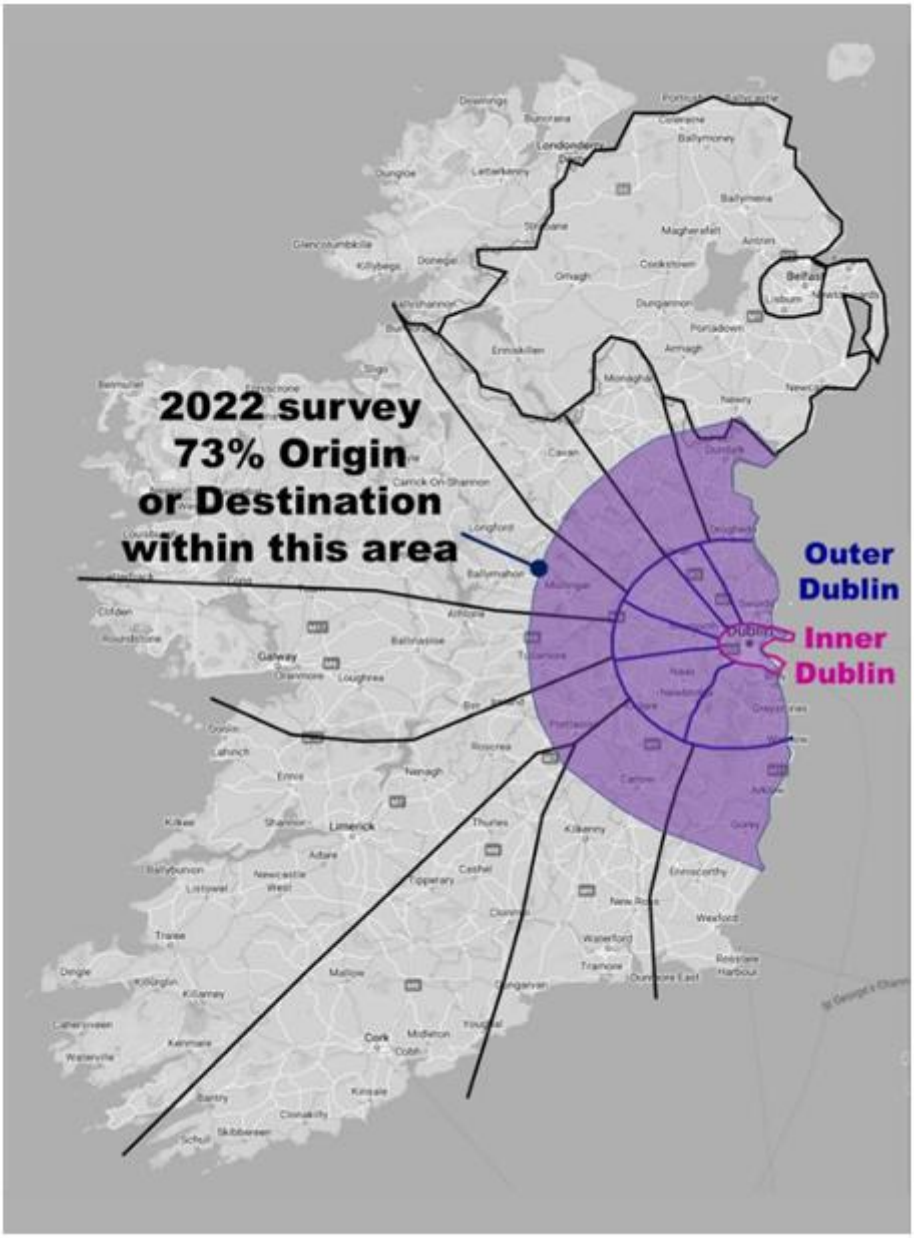


Figure 2-3: Percentage of Dublin Port HGVs having an origin or destination within 90km of the Port

Dublin Port remains committed to investment that facilitates increased rail freight but given the origin/ destination concentration of freight in the Greater Dublin and Leinster area, the impact of rail freight on total port tonnage is likely to remain relatively low. The Dublin Port Tunnel provides the single access point for Dublin Port to the national motorway network and the port throughput capacity that Masterplan 2040 is designed to deliver must be matched by the landside access capacity both in the tunnel itself and on the motorway network. The level of detail in the 2022 Origin Destination survey enabled DPC to estimate how port-related HGV traffic develops across the M50 as it heads to and from the Dublin

Port Tunnel. Using the data, and TII's 2022 published network data for the M50, it was estimated that, across the length of the M50, from Junction 17 (M11) to Junction 3 (M1), HGV traffic to and from the port makes up 1.7% of total vehicle numbers. To put this in some context, vehicle numbers of all types on the M50 reach c.150,000 per day at the busiest point on the network.

2.4.5.3 Inland Terminals

DPC's dwell time and digitalisation initiatives will create a demand within supply chains for inland terminals to which cargo can be moved from Dublin Port.

In parallel with progressing with the ABR2 Project, DPC is proceeding with the project to develop the second site of 22ha at Dublin Inland Port to provide capacity for the storage of laden containers and trailers.

In addition to this, DPC anticipates private sector operators responding to the new realities in Dublin Port and to DPC's lead by developing other inland terminal facilities. Separately, Irish Rail has signalled the potential future development of inland intermodal freight terminals in its Rail Freight 2040 Strategy.

2.4.6 National Port Capacity Context

The development of Dublin Port under Masterplan 2040 seeks to ensure that sufficient port capacity continues to be available over the next 20 years to cater for growth in unitised trade. With Dublin Port's large share of the country's unitised traffic, this is of national importance.

Dublin Port is the country's largest port for both Ro-Ro and for Lo-Lo and, when the volumes in the two modes are combined, Dublin consistently accounts for between 70% and 80% of all trailers and containers passing through Irish ports. Before Brexit, Dublin's share grew to 84% of this traffic and even post-Brexit Dublin's share remains very high at 79%.

Dublin Port's large share of unitised volumes arises for the same reasons of geography that cause Dublin Airport to account for such a large share of national air passenger travel. In addition to having a consistently high share of all unitised freight, Dublin Port's volumes have shown consistent high levels of growth for many years (**Figure 2-4**).

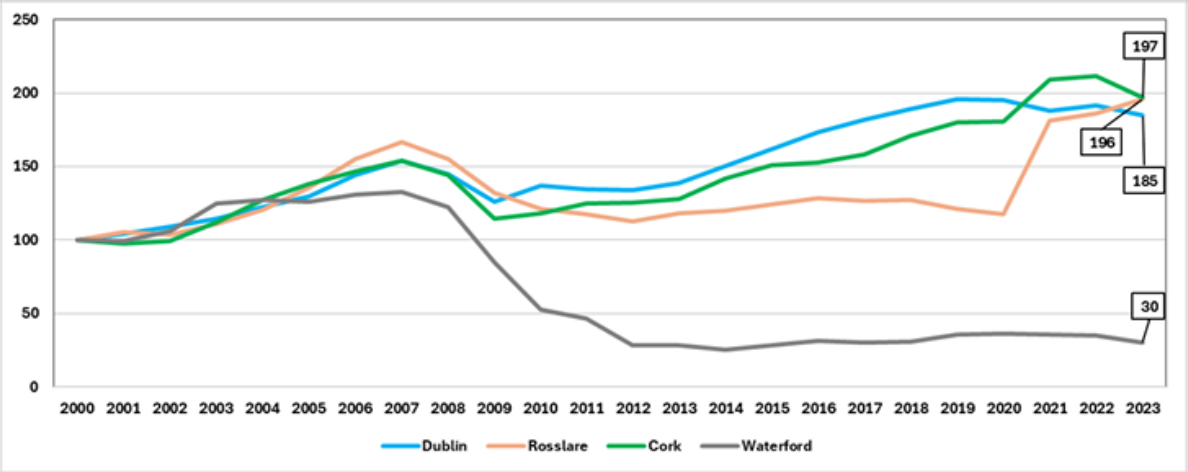


Figure 2-4: Trends in unitised volumes, 2000 to 2023

Whereas the rationale for the ABR2 Project is based on the projected capacity requirements in Dublin Port by 2040, the national importance of the project is recognised in the Ports Policy Issue Paper which notes that national capacity will not be assured unless all currently planned projects are delivered. This includes the ABR2 Project. Against this background, a failure by DPC to bring the ABR2 Project forward would exacerbate an already evident risk of a national port capacity shortage between now and 2040.

2.4.7 Timescale to Deliver the ABR2 Project

Alexandra Basin West is an actively used basin and will remain active throughout delivery of the ABR2 Project in order to minimise any disruption to ongoing port operations. The area surrounding the Berth 52/53 basin is also an active construction site for the ongoing MP2 Project. The MP2 Project, as permitted, amended elements of the ABR Project with respect to the alignment of Riverside Berths 49 and 52 to allow for the insertion and alignment of a new Riverside Berth 53. The new Riverside Berth 53 is currently under construction, and once complete, the basin will be closed off and the operational Basin Berths within Terminal 5 can be decommissioned. Works can then commence as permitted under the ABR2 Project to infill the Terminal 5 Basin with the treated dredged material from Alexandra Basin West.

In addition to complexities associated with ongoing port operations, a key driver for the delivery programme is the rate of dredging, which is a maximum of 4,000m^3/day. It is anticipated that the dredging rates may be constrained by vessel movements within Alexandra Basin West and by both treatment and stockpile capacity at the proposed treatment areas.

Given these complexities, and the need to ensure that Dublin Port continues to operate effectively during its construction, a 10-year planning permission is required.

2.4.8 Concluding Remarks on the Rationale for the ABR Project and the ABR2 Project

As noted above in **Section 2.2**, the ABR Project is required to ensure that the capacity of Dublin Port remains ahead of demand and that no capacity or operational constraints emerge. The Port Capacity Study (IMDO 2023) suggests that any failure to maintain sufficient port capacity could have a major negative impact on the national economy, starving it of the materials needed to continue strong growth. The Study further expressly states that Ireland should have sufficient port capacity for all cargo modes if planned developments are put in place in time.

The ABR Project was, and the ABR2 Project is, such a planned development. The ABR Project and ABR2 Project comprise central elements of the plans for the maximisation of the capacity at the port since the publication of the Dublin Port Masterplan in 2012.

2.5 Planning Policy

This section of the EIAR considers relevant EU, national, regional and local land use and transport planning and development policy guiding and regulating the development of Dublin Port. The relevant planning policies are set out for each level within the planning hierarchy in the sections that follow.

2.5.1 Relevant European Legislation and Planning and Development Policy

Several European Directives of pertinence to the context of the proposed development are set out in brief below. Additionally, policy adopted as result of this legislation has informed national planning, these are also set out where relevant.

2.5.1.1 Birds Directive (79/409/EC)

The Birds Directive is a further cornerstone of the European Union's measures for the protection of biodiversity. It aims to protect naturally occurring wild bird species within the EU and their most important habitats.

To comply with the Directive and achieve these aims, EU countries are required to take any necessary measures to maintain or restore bird populations; the purpose of these measures being to halt decline or disappearance of species but also to allow species to recover and thrive in the long term.

It is the legislation for the designation of Special Protection Areas (SPAs) for birds.

2.5.1.2 Habitats Directive (92/43/EC)

The Habitats Directive (92/43/EEC) forms a key pillar for the conservation of the natural environment and protection of biodiversity in the European Union. Member States must comply with the legislation

and protect the habitats and species listed in the annexes, some of which require more stringent management measures (i.e. those species listed in Annex IV).

It is the legislation for the designation of protected areas such as the Special Areas of Conservation (SACs) which form part of a protective network for habitats and species.

2.5.1.3 Water Framework Directive (2000/60/EC)

The Water Framework Directive (2000/60/EC) (WFD) is the key piece of legislation to protect water in Europe; it focuses on ensuring healthy rivers, lakes, groundwater, transitional and coastal water. An integrated approach to water management is required based on a river basin district approach. The key objectives of the WFD as provided for within Article 4, are to protect and where necessary, restore water bodies to good status (chemically and ecologically) and prevent deterioration. The key implementation tools for the WFD are River Basin Management Plans which are prepared by the Member States, including Ireland. Development proposals are assessed for compliance with the WFD.

2.5.1.4 Marine Strategy Framework Directive (2008/56/EU)

The Marine Strategy Framework Directive (2008/56/EU) (MSFD) aims to achieve Good Environmental Status (GES) for all marine waters in Europe, along with the protection of the resource base for marine related economic and social activities. The areas covered include coastal and outer marine areas, the seabed and appropriate subsoil areas. The implementation of the MSFD occurs via a national Marine Strategy in six-year cycles with Member States required to report on a two-yearly basis. Ireland is currently within cycle 3 (2023 – 2028).

If GES can be achieved and maintained, the outcome will be clean, healthy, production seas where human use of the marine environment is kept at a sustainable level. To comply with the MSFD, GES is to be monitored using the following categories:

- Biological diversity
- Non-indigenous species
- Population of commercial fish / shellfish
- Elements of marine food webs
- Eutrophication
- Sea floor integrity
- Alteration of hydrographical conditions
- Concentration of contaminations
- Contaminants in fish / seafood for human consumption
- Marine Litter

- Introduction of energy including underwater noise.

2.5.1.5 Waste Framework Directive (2008/98/EC)

The Waste Framework Directive (2008/98/EC) provides a legal framework for treating waste in the EU. It seeks to protect the environment and human health by emphasising the importance of proper waste management, recovery and recycling techniques. These practices are intended to reduce pressure on resources and improve the sustainability of resource use.

2.5.1.6 Environmental Quality Standards Directive (2008/105/EC) as amended by 2019/39/EU)

This Directive provides for environmental standards in the field of water policy. Member States must ensure that Environmental Quality Standards (EQS) set for the priority substances as identified within the Directive are met in order to achieve good chemical status. It works in tandem with the WFD to protect surface waters from pollution.

2.5.1.7 Environmental Impact Assessment Directive (2011/92/EU) as amended by Directive 2014/52/EU

The Environmental Impact Assessment Directive 2014/52/EU amended Directive (2011/92/EU). It seeks to ensure the integration of environmental considerations in the development of project proposals and the consenting of same. There are mandatory requirements for EIA included for specified project types along with screening criteria, public participation requirements and requirements for information to be submitted to support the EIA process.

The Directive established the waste hierarchy (Prevention; preparing for Re-use; Recycling; Recovery and Disposal) and the polluter-pays principle. There is a distinction within the legislation between waste and by-products; the latter stemming from a process, the primary aim of which is not the production of that substance or object. Controls for hazardous waste are included.

An amending Directive (2018/851/EU)[4] was published in 2018 to promote the concept of a circular economy and further improve waste management.

2.5.1.8 Marine Spatial Planning Directive (2014/89/EU)

In 2014 the adoption of Directive 2014/89/EU established an EU-wide framework for maritime spatial planning. The directive details the main goals and minimum requirements for Member States as follows:

- Balanced and sustainable territorial development of marine waters and coastal zones;
- Optimised development of maritime activities and business climate;
- Management of ecosystems and biodiversity conservation;

[4] A targeted amendment in 2025 relates to food and textile waste.

- Better adaptation to risks; and
- Resource-efficient and integrated coastal and maritime development.

Marine spatial planning may be defined as—

> *"… a process by which the relevant Member State's authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives"* (Directive 2014/89/EU, Article 3, Paragraph 2).

Ireland transposed the Directive through the European Union (Framework for Maritime Spatial Planning) Regulations 2016. The Minister for Housing, Local Government and Heritage formally established the National Marine Planning Framework (NMPF) on 20th May 2021.

As a result of this directive, several legislative changes have been made with regards to marine spatial planning in Ireland. The Maritime Area Planning Act 2021 (MAPA) was introduced, updating the Irish planning system to facilitate increasing development demand in the maritime environment. This Act introduced statutory bodies, including the Marine Area Regulatory Authority (MARA).

2.5.1.9 Trans European Network - Transport (TEN-T)

The EU's Trans-European Transport Network (TEN-T) policy develops a Europe-wide network of railway lines, roads, inland waterways, maritime shipping routes, ports, airports and railroad terminals. The ultimate objective is to close gaps, remove bottlenecks and technical barriers, as well as to strengthen social, economic and territorial cohesion in the EU while creating integrated and intermodal long-distance, high-speed corridors.

In 2024, the European Commission (EC) revised the Trans-European Network policy for transport[5] (TEN-T) from the previously published 2014 policy, based on Regulation (EU) 2024/1679 (the 2024 Regulation). The TEN-T policy is described by the EC as a key instrument to plan and develop *"a coherent, efficient, multimodal, and high-quality transport infrastructure across the EU"*. With respect to water-based transport it covers inland waterways and short sea shipping routes, along with land-based infrastructure that links urban nodes, maritime and inland ports, airports and terminals.

This policy promotes efficient transportation for people and goods, with a view to ensuring access to jobs and services, and as an enabler for trade and economic growth. For the EU, it will strengthen economic, social and territorial cohesion. Seamless transport systems are to be created across borders, with the aim of removing gaps, bottlenecks or missing links. The 2024 revision increases the focus of the policy on reducing the environmental and climate impact of transport and to increase the safety and the resilience of the network.

[5] Trans-European Transport Network (TEN-T) - Mobility and Transport

The practical detail of the policy is to define the TEN-T network and set out the requirements for the infrastructure to ensure coherent quality. The network consists of three layers: the core network, the extended core network and the comprehensive network.

The core network comprises of the most important connections between major cities and nodes. These are to be completed to the standard set out in the 2024 Regulation by 2030, with the extended core network to be completed ten years later, in 2040, and the comprehensive network (which will connect all regions of the EU to the core network) to be completed by 2050.

Dublin Port is identified as a core port in the network and is part of both the Atlantic and North Sea to Rhine Mediterranean Core Network Corridors as illustrated by **Figure 2-5** below:

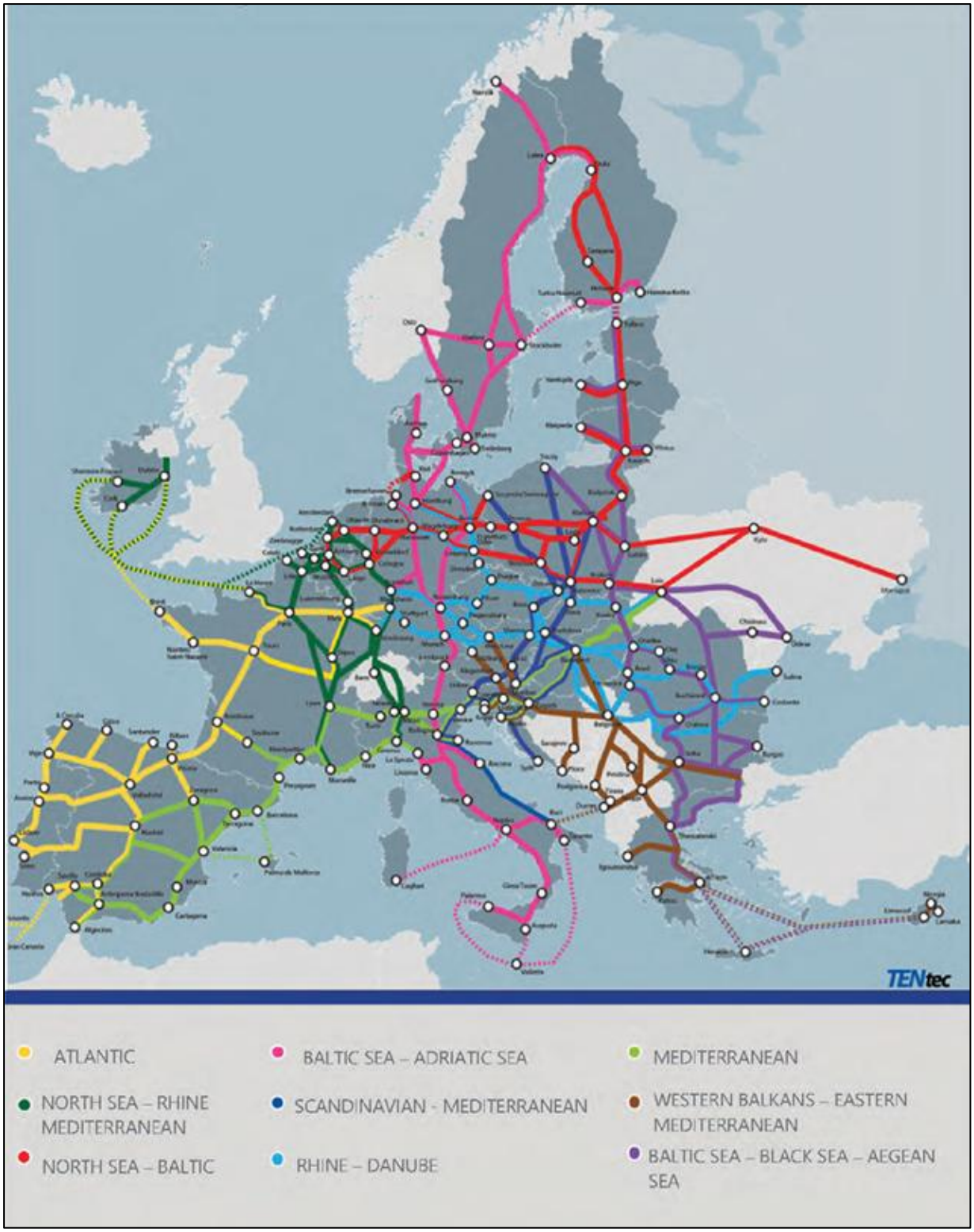


Figure 2-5: Core Networks Corridors[6]

[6] Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013T.

Implementation of TEN-T will ensure the development of more sustainable, competitive transport forms; assist in the reduction of emissions from transport; and provide infrastructure that is resilient against the impacts of climate change. Improved multimodality is promoted. With specific reference to freight, the requirements include an expansion in the number and capacity of transhipment terminals to meet traffic demands.

The 2024 Regulation seeks to achieve a sustainable, smart, seamless and resilient European Maritime Space[7]. The land-side infrastructure is to integrate with the maritime dimension of TEN-T. The 2024 Regulation states:

> *"Being the entry and exit points for the land infrastructure of the trans-European transport network, maritime ports play an important geostrategic role as cross-border multimodal nodes… Short-sea shipping can make a substantial contribution to the decarbonisation of transport by carrying more freight and passengers on sea, inter alia as to reduce road congestion on the Union's territory and to improve access to peripheral and island regions and states. There is however a need to better integrate short-sea shipping links, constituting the maritime dimension of the trans-European transport network, with the landside network and to put stronger emphasis on the entire transport and logistic chain, both to sea and hinterland. The new overarching concept of the European Maritime Space should be promoted by creating or upgrading short-sea shipping routes and by developing maritime ports and their hinterland connections as to provide an efficient and sustainable integration with other modes of transport."* (para 55)

Article 28 of the 2024 Regulation identifies that construction or upgrading of basic port infrastructure are among the priorities for maritime infrastructure development and the European Maritime Space. Article 44 relates to sustainable freight transport and its contribution to the reduction of greenhouse gas emissions, air and noise pollution; this promotes short-sea shipping routes and multi-modal transport service operations.

EU Nature Restoration Law and Implementing Regulation

The Nature Restoration Law (Regulation (EU) 2024/1991) (the NRL Regulation), a key element of the European Union (EU) Biodiversity Strategy for 2030, is a comprehensive legislative initiative aimed at revitalising Europe's natural ecosystems. It sets binding targets to restore degraded ecosystems, particularly those with the most potential to remove and store carbon, to improve climate resilience, and prevent and reduce the impact of natural disasters.

[7] The term 'Motorways of the Sea' has been replaced since the preceding 2014 Regulation with European Maritime Space which includes inter alia short-sea shipping routes and maritime transport infrastructure such as ports, basins, quay walls, berths etc including hinterland connectivity.

The NRL Regulation seeks to restore ecosystems, habitats and species across the EU's land and sea areas to enable the long-term and sustained recovery of biodiverse and resilient nature; contribute to achieving the EU's climate mitigation and climate adaptation objectives; and meet international nature and biodiversity commitments.

Through habitat restoration, pollution control and sustainable land and sea management, aligned with a set of binding targets and obligations for specific habitats and species, this NRL Regulation seeks to protect and enhance Europe's natural heritage. The overarching objective of the legislation is to ensure Member States (MSs) put in place effective and area-based restoration measures in order to reach the ecosystem-specific targets and adopt recovery measures that will cover at least 20% of the EU's land and sea areas by 2030, and all ecosystems in need of restoration by 2050. This means that national governments will have to quantify and map out areas that are to be restored, describe restoration measures, and outline timescales and financing requirements. This will be carried out by way of national restoration plans that will be approved by the European Commission.

The NRL Regulation calls for responsible land use practises and for a balance between conservation efforts and other human activities, encouraging stakeholders to consider the ecological implications and innovate in ways that support both biodiversity and broader climate goals.

Commission Implementing Regulation (EU) 2025/912 of 19 May 2025 then sets out rules for the application of the NRL Regulation to establish a uniform format for the national restoration plans.

2.5.1.10 EU Ports Policy

EU Ports Strategy 2026

The EU Ports Strategy (the Strategy), adopted in March 2026[8], is a framework that seeks to boost the competitiveness, security and sustainability of European Union ports.

The Strategy confirms that ports handle c.74% of the EU's external trade and c.30% of intra-EU freight, which involves the handling of c.3.4 billion tonnes of goods, and c.395 million passengers annually; the EU's ports therefore being essential to Europe's economy and supply chains. It is noted that in 2022, the economic footprint of the EU's ports reached a turnover of c.€90 billion and provided approximately 423,000 direct jobs.

The Strategy recognises that ports are industrial, multimodal hubs which are critical for trade logistics and manufacturing; are energy gateways for electricity connections, offshore renewables, liquid natural gas and hydrogen; and comprise of critical infrastructure for defence, civil protection and supply chain resilience.

The Strategy includes 5 core pillars which seek to:

- Strengthen competitiveness, innovation and digitalisation

[8] An Industrial Maritime Strategy has also been adopted during 2026 which supports this Strategy.

- Advance energy transition, sustainability and clean industries
- Protect and secure ports
- Access to finance and investment
- Social cohesion, skills and quality jobs

The Strategy recognises that maritime connectivity for islands and peripheral regions is fundamental for territorial cohesion, economic resilience and affordability, which should be reflected across EU ports and transport policy.

One of the actions arising relates to a planned European Maritime work plan which is to prioritise inter alia the development of sustainable and green short sea shipping hubs and links, and the upgrade of maritime infrastructure.

Figure 2-6 shows Dublin Port as one of 327 maritime ports in the EU identified in the Strategy.

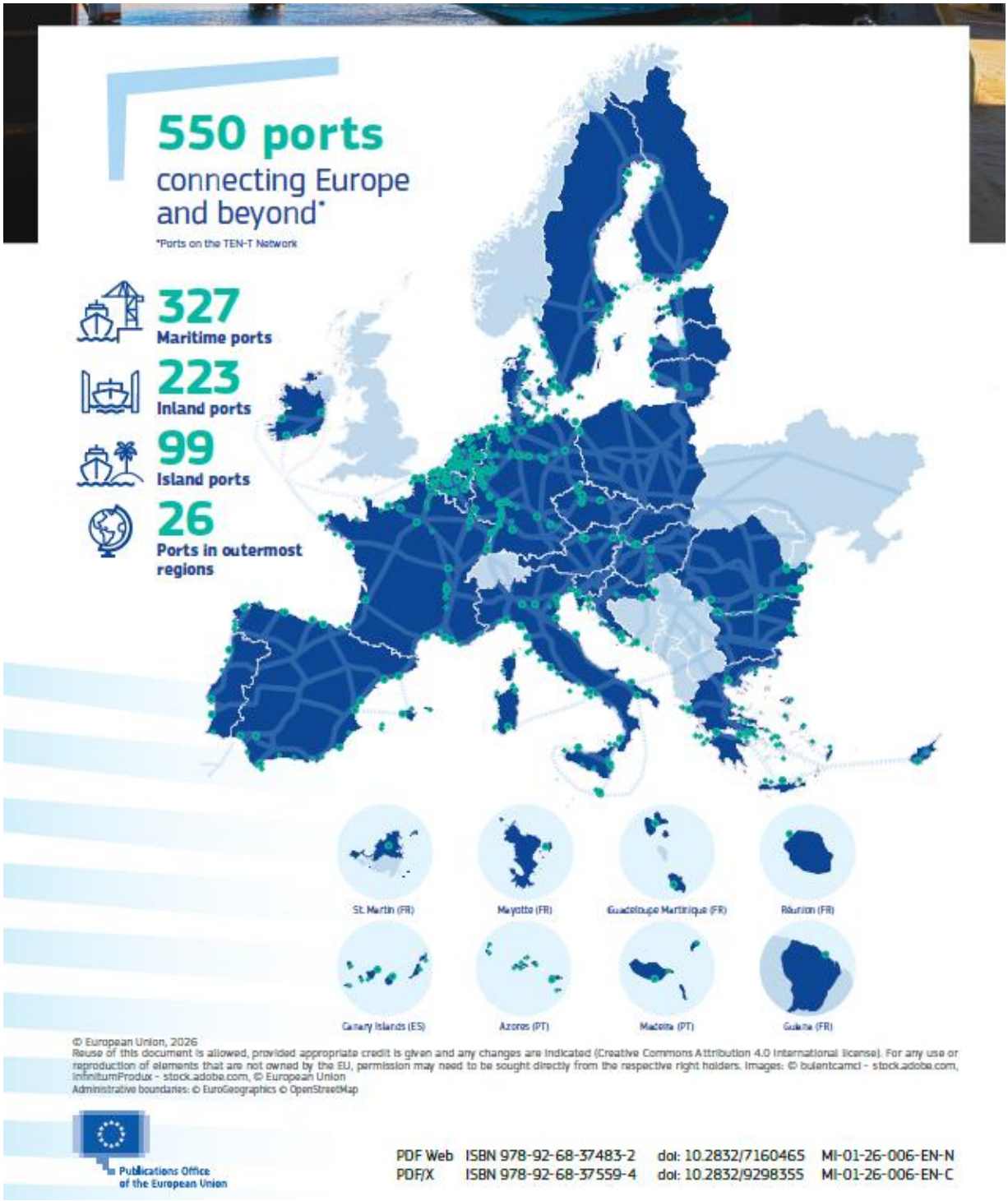


Figure 2-6 EU Ports[9]

[9] ba92abe8-0665-4999-b736-50d68cda7483_en

2.5.1.11 EU Climate Policy

The European Green Deal 2019

In December 2019[10], the European Commission presented the European Green Deal (EGD), a policy package that aims to improve the sustainability of the EU's economy, by turning environmental challenges into opportunities across several policy areas. EU leaders agreed that the EU should achieve carbon-neutrality by 2050. Reducing greenhouse gas emissions would be achieved through changes to a range of existing policies and directives in sectors including transport.

In December 2020, as an intermediate step towards the 2050 goal, EU leaders agreed to more than halve (55%) the EU's greenhouse gas emissions by 2030 compared to 1990 levels, as set out in the Fit For 55 legislative package[11].

In June 2021, the Council adopted the European Climate Law[12] – a key element of the EGD. With it, EU countries are legally obliged to reach both the 2030 and 2050 climate goals. The climate law sets the framework for actions to be taken by the EU and the member states to progressively reduce emissions and ultimately reach climate neutrality in the EU by 2050. At this time the Council also endorsed the new EU strategy on adaptation to climate change presented by the Commission. The strategy outlines a long-term vision for the EU to become a climate-resilient society that is fully adapted to the unavoidable impacts of climate change by 2050.

Within the EGD was a proposal to revise the Combined Transport Directive (TEN-T) to allow for better utilisation, including rail and waterborne transport, short-sea-shipping (transportation by sea between EU/EEA/Candidate countries' ports), which was achieved in 2024 as discussed above.

Sustainable and Smart Mobility Strategy

The EGD includes a target to reduce transport-related greenhouse gas emissions by 90% by 2050. The Commission therefore developed a comprehensive strategy, published in December 2020, to meet this target and ensure that the EU transport sector is more sustainable, digital and resilient. The Sustainable and Smart Mobility Strategy[13] (the Strategy) provides a roadmap towards the mobility of the future. Objectives include the improvement of connectivity and access.

The Strategy builds on the EGD and the 2011 White Paper - Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system[14] (the White Paper). The White Paper placed a strong emphasis on moving vast quantities of goods and passengers at once, avoiding individual transport methods until the final miles of the journey. It focused on infrastructure investment as a priority given the significant time lag between commencement and delivery, in addition to lengthy

[10] EUR-Lex - 52019DC0640
[11] Delivering the European Green Deal - European Commission
[12] Regulation - 2021/1119
[13] EUR-Lex - 52020DC0789
[14] White paper 2011 - Mobility and Transport - European Commission

service lives of stock ships. Ports are highlighted as being a crucial agent in decarbonisation of freight, enabling more efficient waterborne transport, serving as important entry points into the European market. However, target set out for the transport sector with respect to emissions reduction fell short of those set at the December 2015 Climate Conference in Paris (also known as 'COP21') and consequently the EGD.

The Strategy seeks to create zero-emission ports, which should become multimodal mobility and transport hubs with greener services and operations. Along with improved intermodal and multimodal transport, short-sea shipping is also promoted as having a role in greening freight movement; the Strategy acknowledges the role of the initial TEN-T policy which has succeeded in seeing more cargo transported more sustainably in this manner. To assist in the reinforcement of the single market, the Strategy states that:

> *"All necessary steps must be taken to complete the TEN-T on time. The Commission will propose to reinforce the role of the European Coordinators to drive progress on transport corridors across the continent to seek their completion by 2030."* (para 80)

Milestone No. 8 of the Strategy on shifting more activity towards more sustainable transport modes seeks that:

> *"Transport by inland waterways and short sea shipping will increase by 25% by 2030 and by 50% by 2050"*.

2.5.2 National Policy Statements

2.5.2.1 Planning Policy Statement 2015

The Planning Policy Statement[15] (PPS) outlined the principles on which the Irish planning system operates. It was published in 2015 by the Department of the Environment, Community and Local Government. Ten key principles are highlighted which can be summarised to the following:

1. Planning must be plan-led and evidence based
2. Planning must proactively drive and support sustainable development
3. Planning is about creating communities and further developing existing communities in a sustainable manner
4. Planning must support the transition to a low carbon future and adapt to a changing climate
5. Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people
6. Planning will encourage the most efficient and effective use of previously developed (brownfield) land
7. Planning will enhance a sense of place

[15] Planning Policy Statement 2015

8. Planning will conserve and enhance the rich qualities of natural and cultural heritage
9. Planning will support the protection and enhancement of environmental quality
10. Above all, planning will be conducted in a manner that affords a high level of confidence" (page 2)
11. Derived from the ten key principles, are four key priorities that guide planning legislation moving forward from publication. These priorities are:

    - Maintaining High Standards of Public Confidence
    - Enhancing Service Delivery
    - Planning and Economic Recovery
    - Quality in Planning Outcomes

2.5.2.2 Marine Planning Policy Statement 2019

The Marine Planning Policy Statement (MPPS)[16] underpins the Marine Planning system in Ireland. It was published in November 2019 and accompanies the PPS which relates to the terrestrial planning system. The MPPS sets out an outline for an Irish marine planning system that will adequately protect the marine environment, enable appropriate development in marine areas and meet EU obligations in relation to marine planning. Arising directly from the MPPS is legislation such as the Marine Area Planning Act 2021, which addresses the objectives set out in the MPPS.

2.5.3 National Climate Legislation

The Climate Action and Low Carbon Development (Amendment) Act 2021[17] is the most recent piece of legislation published by the Irish government. This builds on the earlier legislation, the Climate Action and Low Carbon Development Act 2015, to enact the EU obligation to meet a net-zero emissions target no later than 2050. The legislation provides a basis for the national Climate Action Plan and its annual updates, along with local authority Climate Action Plans to be updated every five years, and for carbon budgets that inform sectoral emissions ceilings. The carbon budgets must align with the Paris agreement and Ireland's other international obligations. The current iteration of the Plan is the Climate Action Plan 2025, adopted by Government in April 2025. Work on the Climate Action Plan 2026 is ongoing, but it has not yet been published or adopted by Government.[18]

[16] Marine Planning Policy Statement
[17] Climate Action and Low Carbon Development (Amendment) Act 2021
[18] https://www.oireachtas.ie/en/debates/question/2026-04-16/94/

2.5.4 Relevant National Policy

2.5.4.1 National Ports Policy 2013

The National Ports Policy 2013 A review of the National Ports Policy 2013 is being progressed by the Department of Transport ("the Department".)

[19] (NPP) is the statement of domestic policy underpinning the development and operation of Ireland's ports.

Ports are divided into Ports of National Significance (Tier 1), Ports of National Significance (Tier 2) and Ports of Regional Significance. Within the NPP, Dublin Port is a Port of National Significance (Tier 1). Tier 1 ports are responsible for 15% to 20% of overall tonnage moved through Irish ports annually (of which Dublin Port handles 44%), and which have clear potential to lead the development of future port capacity in the medium and long term.

Referring specifically to the Dublin Port Masterplan, which includes the ABR Project as now proposed to be completed under the ABR2 Project, the policy confirms that:

> *"The Government endorses the core principles underpinning the company's Masterplan and the continued commercial development of Dublin Port Company is a key strategic objective of National Ports Policy".* (page 25)

The policy highlights that the relationship and interaction between the commercial ports sector and the planning and development system is extremely important in ensuring continued sustainable development of the ports sector. It continues that:

> *"The provision of adequate and efficient capacity into the future is a crucial Government strategic objective".* (page 43)

To this end the policy states:

> *"Therefore, Government expects the Ports of National Significance (Tier 1) to lead the response of the State commercial ports sector to future national port capacity requirements……It is the Government's position that those ports considered to be of national significance must be capable of the type of port capacity required to ensure continued access to both regional and global markets for our trading economy".* (page 44)

With respect to the planning policy hierarchy the policy confirms:

> *"National and Regional Planning Guidelines should also recognise the importance of the three categories of ports and allow for their continued development. To this end, the Department contributes as necessary to the development of Regional Planning Guidelines*

[19] National Ports Policy

> *in order to ensure that the goals of National Ports Policy are recognised in the planning hierarchy".* (page 45)

To this end, the Department contributes as necessary to the development of Regional Planning Guidelines to ensure that the goals of the NPP are recognised in the planning hierarchy, highlighting the important role that ports play both regionally and nationally.

2.5.4.2 Review of National Ports Policy

A review of the National Ports Policy 2013 is being progressed by the Department of Transport ("the Department".)

A first public consultation ran from 19 October 2023 to 15 January 2024. Submissions were invited from all interested parties including ports, shipping operators, industry stakeholders involved in the broader logistics and supply chain sectors, academics, and the general public on a thematic Issues Paper to help inform the review of the National Ports Policy. This first public consultation was informed by the *Irish Ports Capacity Study* 2023.

The consultation was based on an issues paper, Review of National Ports Policy – Issues Paper 2023 (the Issues Paper)[20] that was published alongside the Irish Ports Capacity Study. The Issues Paper confirms that 90% of the volume of goods traded by Ireland enter and exit via the commercial port network; the port sector remains a vital facilitator for the national economy and affects all Irish citizens. With respect to Dublin Port specifically, it notes that:

> *"significant investment has occurred to transform Dublin Port into a state-of-the-art facility that handles in volume terms more than 50% of all goods entering and leaving the State".* (page 19)

The impacts of Brexit are noted with a marked increase in maritime traffic, particularly unaccompanied Ro-Ro, between Ireland the mainland EU having occurred since the UK's departure from the EU, and the impacts of Covid-19 also having resulted in increased Lo-Lo traffic. Increased unaccompanied Ro-Ro and Lo-Lo, which are sub-sectors requiring intensive use of port infrastructure, along with the need for post-Brexit custom controls is identified as placing more demand on port space.

The Issues Paper references the conclusion of the Port Capacity Study (2023) whereby Ireland should have sufficient port capacity for all modes: Ro-Ro, Lo-Lo, Dry Bulk, Break Bulk, and Liquid Bulk, until approximately 2040, with the proviso that:

> *"If the planned developments are put in place in time, then the capacity will be sufficient to meet the forecasted demand in the highest growth scenario"* (page 18).

However, the importance of proceeding with investment in capacity, infrastructure, equipment and hinterland connectivity is highlighted, with a failure to do so identified as posing serious risks to the

[20] Review of National Ports Policy Issues Paper 2013

future success of Ireland's ports and the national economy. It is noted that *"Port infrastructure takes a long time to plan and construct"*.

In July 2026, a Draft National Ports Policy was published, and the next stage of public consultation was commenced. The principal provisions of the Draft National Ports Policy which are relevant to the development of Dublin Port (including the ABR2 Project) are:

- Dublin Port will continued to be recognised as a 'Port of National Significance' along with other ports.
- With regard to post-2040 capacity a renewed focus is required by all commercial State ports on maximizing the utilisation of existing port assets and planning for the continued growth of same. Revised master planning will be necessary to drive regional growth, support development of offshore renewable energy developments, and capture the additional growth in post-2040 trade, particularly on the east coast (as per Policy Objective 6).

2.5.4.3 Project Ireland 2040

The National Planning Framework (NPF) and the National Development Plan (NDP) combine to form Project Ireland 2040, which is accompanied by the National Marine Planning Framework (NMPF), a maritime equivalent to the NPF. The NPF sets out Government's vision and strategy for the growth and development of Ireland to 2040. The NMPF delivers a clear policy context for managing Ireland's territorial waters. While the NDP provides the enabling investment and capital expenditure projections to implement these strategies. In combination, these plans form Project Ireland 2040, which when executed will bring about improvements and growth to support a growing country.

2.5.4.3.1 National Planning Framework - First Revision 2025

The NPF – First Revision 2025 [21] replaces the NPF of 2018 to take account of changes and build on that initial framework. The NPF seeks to guide public and private investment, create opportunities for the people of Ireland and protect and enhance the environment, all in the context of an expected additional one million people living in the country between 2022 and 2040.

The goals of the NPF are set out as National Strategic Outcomes (NSOs). The most relevant to the ABR2 Project is NSO 4 - High Quality International Connectivity, which is considered

> *"crucial for overall international competitiveness, this will be achieved through key investments in our ports and airports in line with sectoral priorities already defined though National Ports Policy and National Aviation Policy and signature projects such as the Port of Cork – Ringaskiddy Development and planned investments at Dublin Airport, Dublin Port and Shannon Foynes".* (page 6)

[21] National Planning Framework First Revision 2025

In terms of the implementation of NSO 4 with respect to ports and shipping, the NPF acknowledges the long-term international trend towards increased consolidation of resources to achieve optimum efficiencies of scale. It goes on to state:

> *"This effects [sic] vessel size, the depths of water required at ports and the type and scale of transport connections to serve ports and their hinterlands".* (page 160)

The very large proportion of national port freight traffic accommodated by the Tier 1 ports is noted. The role of these ports will be considered in tandem with long-term infrastructural requirements as part of the Regional Spatial and Economic Strategy and Metropolitan Area Strategic Plan processes. Nationally, several infrastructure objectives have been identified, including a need to facilitate the growth of Dublin Port and innovative land use models.

Chapter 7 of the NPF *'Realising our Island and Marine Potential'* provides further context on the role and development of ports, and advisees that:

> *"the strategic importance of Ireland's port and shipping services in underpinning international trade and enabling economic growth cannot be overstated, with approximately 90% of our international trade moving by sea"* (page 100).

This is linked to Ireland's position as an island nation where we rely on high quality, efficient ports to a much greater extent than many of our trading partners. The role of ports as key logistics and distribution hubs is noted and the ability of the port and shipping sector to demonstrate agility and resilience through new route development to continental Europe following Brexit is acknowledged. The NPF states that:

> *"As a small open economy with a strong focus on international trade and export-led growth, we must be capable of delivering additional port capacity in a timely and predictable manner. National ports policy indicates that the three Tier 1 Ports of National Significance (Dublin, Cork and Shannon Foynes) have clear potential to lead the development of future port capacity in the medium and long term, when and as required".* (page 100)

The recent significant investment to position Ireland's ports for future growth and resultant significant improvements both in terms of capacity and capability is acknowledged, as is the fact that our ports are largely guided by individual long-term plans and strategic visions, ensuring a plan-led approach.

The NPF notes that port infrastructure requires development and associated activities on both land and within the nearshore which often occurs close to environmentally sensitive areas.

The NPF states that:

> *"strategic plans for relevant Tier 1 and 2 ports and corresponding city growth strategies should align and be consistent with the broader aims and policies for the effective growth and sustainable development of the city regions".* (page 101)

With respect to Dublin City, while the NPF places a strong emphasis on development in the regions, Dublin will continue to play a key role for its region as a major centre of population and will be supported as the country's leading global city of scale. One of the key future growth enablers for Dublin as set out in the NPF is as follows:

> *"Facilitating the growth of Dublin Port through greater efficiency, including improved rail freight transfer options, automation and technology updates, limited expansion into Dublin Harbour and improved road access, particularly to/from the southern port area;"* (page 33)

The NPF contains several National Policy Objectives (NPOs) related to marine development (referenced within the National Marine Planning Framework 2021 as discussed below in Section 2.5.4.2.2[22]), including:

- *"NPO – 48: Regional, metropolitan and local development plans will take account of and integrate relevant maritime spatial planning issues…*
- *NPO – 49: Support the sustainable growth and development of the maritime economy and continue to invest in the seafood sector and our Fishery Harbour Centres, particularly in remote rural coastal communities and islands…*
- *NPO – 50: Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance State Fishing Harbours and smaller harbours are addressed as part of the Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, in accordance with National Ports Policy…*
- *NPO – 51: Support the sustainable delivery of port and harbour infrastructure to facilitate the development, maintenance and operation of off-shore renewable electricity generating developments...*
- *NPO – 52: Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality…*

[22] The National Planning Framework (NPF) recognises the importance of integration between land and marine planning (Chapter 7), and the many shared aims and overlapping areas of co-ordination and activity across the two regimes. The NPF contains six national planning objectives that are specific to the marine sector.

- *NPO – 53: In line with the collective aims of national policy regarding climate adaptation and the associated legislative provisions, to take account of the effects of sea level changes and coastal erosion in planning and development management and to support the implementation of adaptation responses to limit risks to communities and coastal ecosystems from the impacts of coastal change…*
- *NPO – 54: Support the development of coastal change management plans to address the likely effects of sea level changes and coastal erosion and to support the implementation of adaptation responses…*
- *NPO – 55: To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and offshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbines and for the operation and maintenance of offshore renewable energy projects."*

2.5.4.3.2 National Marine Planning Framework 2021

Marine Spatial Planning (MSP) in Ireland is underpinned at the highest level by the European Marine Spatial Planning Directive (Directive 2014/89/EU) (MSPD). Ireland's first marine spatial plan, the National Marine Planning Framework (NMPF)[23], published in June 2021, serves as a parallel to the NPF, and enables the Government to set a clear direction for managing Irish seas, clarify objectives and priorities and direct decision makers, users and stakeholders towards strategic, plan-led, and efficient use of marine resources. The NMPF has been prepared with an ecosystem-based approach and has been informed by best available knowledge.

The NMPF includes several overarching objectives for our marine environment. Underlying policies are then provided to assist in the achievement of each objective. The overarching objectives are organised under key themes as follows:

Environmental – Ocean Health:

> *"Comprehensive, integrated management of human activities-based on the best available scientific knowledge about the ecosystem and its dynamics, in order to identify and take action on influences which are critical to the health, diversity and productivity of marine ecosystems, thereby achieving sustainable use of ecosystem goods and services and the maintenance of ecosystem integrity. This objective is derived from the description of the ecosystem approach set out by OSPAR. It will be achieved through specific environmental policies that are aligned to Ireland's achievement and maintenance of Good Environmental Status (GES)."* (page 29)

[23] National Marine Planning Framework

Economic – Thriving Ocean Economy:

- *"Promote the sustainable development of a thriving ocean economy.*
- *Promote the development of vibrant, accessible and sustainable rural coastal and island communities.*
- *Help realise the potential of marine resources in an integrated fashion and deal with interaction between different interests in a fair, balanced and trans manner, including those who are employed in the marine sector."* (page 76)

Co-existence

"To encourage effective use of space to support existing and future sustainable economic activity through co-existence, mitigation of conflicts and minimisation of the footprint of proposals." (page 80)

Social – Engagement with the Sea

- *"Establish robust governance, policy and planning frameworks to enable and promote the development of vibrant, accessible, resilient and sustainable coastal and island communities.*
- *To promote the preservation and enjoyment of marine-related cultural and heritage assets.*
- *To strengthen our maritime identity and increase awareness of the value, opportunities and social benefits of engaging with the sea.*
- *Establish policy and planning frameworks to enable sustainable utilisation of our marine resources, with an emphasis on ensuring effective and meaningful public and stakeholder participation in planning processes.*
- *Address land and sea interactions and promote integration, co-ordination and coherence between land and marine planning systems".* (page 84)

The overarching policies and sectoral policies for the marine are provided in detail within a Planning Report that will accompany the application for consent; those sectoral policies of most relevance are provided later in this section.

The NMPF discussed '*Key Issues for Marine Planning*' and with respect to ports, states as follows:

> *"Ports and shipping are the country's trading lifeline. Safeguarding access to ports, harbours and navigation channels is vital to the national economy. The safety and security of shipping and ports must be taken into consideration when considering all other applications for activity or development in the vicinity of ports or shipping channels…*

> *Brexit has brought into renewed focus the importance of Ireland's ports as nodes in the logistics chain and in keeping Ireland connected internationally. As the economy grows, the ability of our ports to respond by adding capacity and adjusting to new environmental and technological demands is imperative to ensure the sustainability of our economic success. Marine development should not be permitted where it would restrict access to, or future expansion of, commercial ports or the development of new ports, which may be needed in the future."* (page 154)

The NMPF recognises that all Tier 1 ports are currently engaged in significant phases of infrastructure investment in relation to their masterplans, and states:

> *"Dredging is essential to maintain channels and deepen berths especially as the sector is moving to ever-larger ships with greater capacity. Dredged material may be disposed of at marine sites licensed by the EPA or, if possible, used for alternative purposes such as land reclamation or beach nourishment to minimise disposal at sea. Locations of disposal sites may change over time for a variety of reasons, for example the exhaustion of site capacity, monitoring requirements, or the need for new sites in additional locations. Designated areas are required to dispose dredged material to ensure that ports subject to silting can be kept operational and maintain their depths, especially when urgent dredging is required after storm activity. Identification of new dredge disposal sites should be supported by robust feasibility and site selection and should include a review of existing sites in the context of climate adaptation."* (page 155)

In terms of growth the NMPF states:

> *"Freight volumes are expected to continue to increase over the coming decades, while vessel sizes are also predicted to grow and vessel types set to further diversify. In this context accessibility, capacity and navigational safety will be significant challenges for all players and port development will trend seawards. Allocation of sufficient space for future growth, the strategic identification of long-term port locations and development of existing ports all need to be factored into long-term economic and spatial planning (terrestrial and marine)."* (page 155)

With respect to interactions with other activities, the NMPF notes that all marine sectors rely on ports and shipping activities.

The NMPF includes sectoral objectives and supporting policies. The objectives for the Ports, Harbours and Shipping sector are set out in **Table 2-4** below.

Table 2-4: Sectoral Objectives of the NMPF – Ports, Harbours and Shipping

Sectoral Objectives of the NMPF – Ports, Shipping and Harbours
Safeguard the operation of ports as key actors in the economic wellbeing of the State through the provision of safe and sustainable maritime transport.
Facilitate a competitive and effective market for maritime transport services.
Sustainable development of the ports sector and full realisation of the National Ports Policy with a view to providing adequate capacity to meet present and future demand, and to adapt to the consequences of climate change.
Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, and smaller harbours are appropriately addressed in regional and local marine planning policy.

The sectoral policies for Ports, Shipping and Harbours are as per **Table 2-5** below.

Table 2-5: Sectoral Policies of the NMPF – Ports, Harbours and Shipping

Sectoral Policies of the NMPF – Ports, Shipping and Harbours
Ports, Harbours and Shipping Policy 1 To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use: • The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes; • A mandatory Navigation Risk Assessment; • Where interference is likely: whether reasonable alternatives can be identified; and • Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organisation can be achieved at no significant cost to the shipping or ports sector.
Ports, Harbours and Shipping Policy 2 Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts, and d) if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding.

Sectoral Policies of the NMPF – Ports, Shipping and Harbours
Ports, Harbours and Shipping Policy 3 Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate consideration of the National Ports Policy, the National Planning Framework and relevant provisions related to the TEN-T network.
Ports, Harbours and Shipping Policy 4 Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have: • been informed by consultation at pre-application stage or earlier with the relevant port authority; • have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and • have consulted Department of Transport, MSO and Commissioners of Irish Lights. Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process.
Ports, Harbours and Shipping Policy 5 Proposals for capital dredging will be supported where it is necessary to safeguard national port capacity and Ireland's international connectivity, and where required compliance assessments associated with authorisations have been carried out and incorporated into subsequent competent authority decision(s).
Ports, Harbours and Shipping Policy 6 In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity.
Ports, Harbours and Shipping Policy 7 Proposals for maintenance dredging activity will be supported where: • relevant decisions by competent authorities incorporate the outcome of statutory environmental assessment processes, as well as necessary compliance assessments associated with authorisations, including in relation to the planning process; • there will be no significant adverse impact on marine activities or uses or the maritime area. Any potential adverse impact will be, in order of preference, avoided, minimised or mitigated; • dredged waste is managed in accordance with internationally agreed hierarchy of waste management options for sea disposal. • if disposing of dredged material at sea, existing registered disposal sites are used, in preference to new disposal sites; and • where they contribute to the policies and objectives of this NMPF.
Ports, Harbours and Shipping Policy 8

Sectoral Policies of the NMPF – Ports, Shipping and Harbours
Proposals that cause significant adverse impacts on licensed disposal areas should not be supported. Proposals that cannot avoid such impact must, in order of preference: a) minimise, b) mitigate, or if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding.
Ports, Harbours and Shipping Policy 9 Proposals for the management of dredged material must demonstrate that they have been assessed against the waste hierarchy (see Glossary).
Ports, Harbours and Shipping Policy 10 Proposals identifying new dredge disposal sites which are subject to best practice and guidance from previous studies should be supported where: • competent authority decisions incorporate necessary compliance assessments associated with authorisations; and • they contribute to the policies and objectives of this NMPF. Proposals must include an adequate characterisation study, be assessed against the waste hierarchy and must be informed by consultation with all relevant stakeholders.

The NMPF seeks to ensure that all activities and required infrastructure and maintenance efforts are supported and uninterrupted by other maritime development, owing to the national strategic importance of Irish ports, especially Dublin Port, given that it accounts for almost 50% of all trade in the State.

2.5.4.3.3 National Development Plan 2021-2030

The implementation of the NPF will be fully supported by the Government's investment strategy for public capital investment. The National Development Plan 2021-2030 (NDP)[24] [25] identifies the strategic priorities for public capital investment needed to underpin the implementation of the NPF and NMPF.

NSO 6 *"High-Quality International Connectivity"* seeks to target continued investment in port and airport connections to the UK, EU and the rest of the world. The NDP notes that major capital infrastructure programmes are currently ongoing at the Tier 1 Ports located in Dublin, Cork and Shannon Foynes.

These infrastructure programmes will enhance national and international connectivity, provide for future increases in trade and national port capacity requirements by facilitating more vessels, larger sized

[24] National Development Plan 2021-2030

[25] A review of the NDP 2021-2030 was published in 2025. This outlines an increase in capital expenditure that will arise from 2026 to 2030; no specific ports projects are identified but a significant investment allocation to the transport sector is noted.

vessels and increased tonnage and throughput. The NDP adds that none of these projects receive Exchequer funding. However, strengthening access routes to Ireland's ports through investment to upgrade and enhance the transport network to improve journey times is and remains a government priority.

One of the projects to which the NDP expressly refers is the redevelopment of Alexandra Basin West, including dredging works, which are now proposed to be completed under ABR2. The NDP states that this investment:

> *"will help future-proof the port in terms of being able to facilitate larger sized vessels into the future (in terms of both length and draft) and provide for increased capacity."* (page 110)

2.5.4.3.4 National Adaptation Framework 2024

The National Adaptation Framework 2024 (NAF)[26] was published following a statutory review of the first NAF 2018. The initial NAF was required to comply with the Climate Action and Low Carbon Development Act of 2015 (the Climate Act) subsequently amended in 2021. It seeks to create a unified approach involving both government and society to adapt to climate change, outlining how various sectors and local authorities can implement adaptation measure to minimise Ireland's vulnerability to the adverse effects of climate change and taking advantage of any beneficial impacts. Adaptation strategies are to be integrated into policy making, infrastructure development and local planning.

The NAF must be reviewed every five years in accordance with the Climate Act. The 2022 review identified evolving policies, increased knowledge about climate change, and a noticeable increase in the frequency and severity of climate impacts. Accordingly, the latest NAF contains broader guiding principles and an emphasis on urgent development of *"for more intelligent, rapid, and far-reaching adaptation strategies"*. A pathway planning approach, considering a variety of potential future warming and impact scenarios, is advocated for, to ensure flexible and effective adaptation measures. It seeks outcomes so as monitoring and evaluation of progress can be improved.

The NAF requires the preparation of Sectoral Adaptation Plans (SAPS) including one for the transport sector (see **Section 2.5.4.2.5** below), which are to align with local authority Climate Action Plans where practicable.

With respect to implementation, the NAF confirms that it *"does not provide consent or establish a framework for granting consent and will not be binding on any decisions relating to the granting of consent"*. The NAF sits alongside statutory documents that form the framework for future development consent of projects.

[26] National Adaptation Framework 2024

2.5.4.3.5 Transport – Sectoral Adaptation Plan II 2025

The current Transport Sectoral Adaptation Plan 2025 (T-SAP-II)[27] was published on 14th November 2025. It comprises of a strategic document to promote long-term resilience to climate change impacts (occurring already and predicted in future) in Ireland's transport system (e.g. floods, storms, heatwaves, sea-level rise and other climate-related impacts) to protect against journey disruption and infrastructural damage.

The sectoral overview of maritime transport reiterates the importance of Ireland's maritime sector, with respect to the transport of traded goods. Dublin Port is highlighted due to the proportion of national throughput of freight and passengers it facilitates. Irish ports processed 51,063 tonnes of goods in 2024, a 7% increase from 2023, according to the T-SAP-II.

Challenges for ports identified in the T-SAP-II ed are ongoing logistical difficulties and costs requirement for dredging; spatial constraints such as limited land availability; and regulatory and planning barriers, all of which can hinder port expansion. Despite this, the significant investments made by ports such as Shannon Foynes, Cork, Dublin, and Rosslare Europort to increase overall capacity, as well as to support development and maintenance of offshore renewable energy (ORE) wind turbine installation and operation are noted. The T-SAP-II identifies key infrastructure developments for ports as including:

- Dublin Port 3FM Project – Designed in accordance with the Dublin Port Masterplan 2040, the project has multiple elements to deliver, ensuring that port capacity remains ahead of demand;
- Dublin Port MP2 Project – Awarded €73.8 million in funding from the EU's Connecting Europe Facility for Transport, it will increase the capacity of Dublin Port through the construction of new berths and installation of shore-to-ship power.

Port infrastructure will need to be more resilient in future in the context of climate-related weather impacts to ensure resilience of sea connectivity. Impacts such as storm damage to berths, increased sand movements and sedimentation and cancellation of vessels with shallow drafts are noted as impacts from Storm Brendan on Dublin Port (as a case study). More recently in December 2025 Storm Bram caused damage to the rock armour of the Great South Wall requiring significant remedial works.[28]

Cascading risks to other sectors such as tourism are identified, whereby ferry cancellation for example results in reduced visitor numbers and loss of economic activity.

Adaptation measures to climate risks to ports are to be incorporated into the port masterplans by 2030.

[27] Transport Sectoral Adaptational Plan T-SAP II
[28] https://www.dublinport.ie/dublin-port-commences-e2-5million-investment-to-protect-critical-great-south-wall/

2.5.4.3.6 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25)[29] is the fifth overall and the third to be prepared under the Climate Act. Its provisions remain in force pending the finalisation of CAP26 which is still being prepared by Government. It sets out a plan to prepare for the challenges of Ireland's second carbon budget period 2026-2030.

The focus in CAP25 for maritime transport is on maximising rail freight and decarbonising fuel. The anticipated revised NPP will be aligned with CAP25, the NAF 2025 and the T-SAP-II and will endeavour to follow the Climate Change Advisory Council's recommendation on prioritising measures for the strengthening of Irish ports' climate resilience. Furthermore, according to CAP25, the anticipated revised NPP will recognise and facilitate the role of ports in enabling energy transitions in the future (including the decarbonisation of shipping and the wider logistics chain).

With respect to the marine environment, CAP25 acknowledges developments including movement on the Marine Protected Areas Bill[30] which will enable the designation and management of Marine Protected Areas (MPAs); completion of ecological sensitivity analyses of the Irish Sea which identifies suitable areas for future MPAs; and the publication of a draft Marine Strategy Part 1, an in-depth assessment of Ireland's marine environment. By 2030 it is envisaged that 30% coverage of the Irish maritime area by MPAs will be achieved. It is also planned that there will be statutory ocean environment policy statement in future, setting out government objectives and targets for the marine environment. Increases in the areas classified to be designated as Special Protection Areas for marine birds have also occurred.

Work in developing indicators for the monitoring and assessment of climate change on the marine environment, and on data collection and research in this field is also noted.

The annex of actions of CAP25 includes actions for the transport sector and for the marine environment. These include:

- TR/25/13: Review of the NPP to set a policy framework to contribute to the decarbonisation of maritime transport and the wider logistics chain and to support the development of Offshore Renewable Energy, and
- MA/25/1: Prepare Ministerial Guidelines for Competent Authorities on Designated Maritime Area Plans (DMAPs).

As outlined earlier, the review of the NPP is currently underway. The guidance on preparation of DMAPs has not yet been published at the time of writing and there currently is no DMAP as yet on the east coast.

[29] DECC Climate Action Plan 2025
[30] A General Scheme for the Maritime Area Planning (Marine Protected Areas) (Amendment) Bill was approved by government in November 2025.

National Biodiversity Action Plan 2023-2030

Ireland's National Biodiversity Action Plan 2023-2020 (NBAP)[31] sets out five objectives to assist in the protection and conservation of biodiversity in Ireland. These are set out in **Table 2-6** below.

Table 2-6: The Five Objectives of Ireland's National Biodiversity Action Plan

The Five Objectives of Ireland's National Biodiversity Action Plan
Adopt a Whole-of-Government, Whole-of-Society Approach to Biodiversity
Meet Urgent Conservation and Restoration Needs
Secure Nature's Contribution to People
Enhance the Evidence Base for Action on Biodiversity
Strengthen Ireland's Contribution to International Biodiversity Initiatives

Targets included within the NBAP include that by the end of 2026, all local authorities will have a Biodiversity Action Plan; that there will be enhanced implementation of the Birds and Habitats Directive; that by 2027 Ireland's rivers, lakes and coastal water bodies are restored to at least good ecological status; and that by 2026 Ireland is meeting all requirements for its transitional, coastal and marine environment under the Water Framework Directive and the Marine Strategy Framework Directive, and achieving and maintaining High or Good Ecological Status and Good Ecological Status, respectively.

In respect of the Marine Strategy Framework Directive, it is intended that the marine environmental standards are integrated into the planning, consenting and operational systems for human activities in the maritime area. The objective is to ensure that resources are used sustainably and marine biodiversity and ecosystem services are conserved and restored. Attaining these actions involves the implementation of the NMPF.

2.5.4.3.7 Water Action Plan 2024: A River Basin Management Plan for Ireland

The Water Action Plan 2024: A River Basin Management Plan for Ireland[32] (the WAP) sets out measures to protect and restore Ireland's natural waters in compliance with the WFD. This includes rivers, lakes, canals, coastal waters, transitional water and groundwater. The objective of the WAP is to either protect water bodies at good or high status or restore them to at least good status. According to the WAP, the Government's objective will be to achieve as close to 100% of the water status objectives by 2027, as possible.

Specific measures are to be set out within 46 no. separate Catchment Management Work Plans for each catchment area. The relevant catchment area for the proposed development is the Liffey and Dublin Bay catchment (no. 09) for which reports are prepared.

[31] National Biodiversity Action Plan
[32] Water Action Plan 2024: A River Basin Management Plan for Ireland

2.5.4.3.8 Draft Offshore Renewable Energy Development Plan (OREDP II) 2023

An Offshore Renewable Energy Development Plan (OREDP I)[33] was first published in 2014 and was subject to an interim review in 2018[34]. The initial OREDP set out key principles, actions and enablers for the harnessing of offshore renewable energy (ORE) in Ireland.

Since then, significant developments in policy, legislation and regulation have occurred and additional marine data is available and therefore an update began in 2021. The OREDP I was a cross-sectoral plan to facilitate the development of ORE, but the OREDP II[35] (currently in draft form) is a national spatial strategy to support the sustainable and planned long-term development of ORE. It will provide a framework and evidence base to assist in identifying 'Broad Areas' best suited to the development of fixed wind, floating wind, wave and tidal under a plan-led regime. Offshore renewable areas will then be designated under the MAPA.

Key objectives for OREDP II include assessing the resource potential for ORE; providing an evidence base to facilitate identification of the 'Broad Areas' for deployment of ORE in Ireland's maritime area; and identifying critical gaps in marine data or knowledge and recommending prioritised actions to close same.

The OREDP II will support the implementation of the new forward marine planning framework established in 2021 by the MAPA, the MPPS and the NMPF.

It is stated that effective spatial planning and management of Ireland's maritime resource is crucial in order to maximise the potential for ORE development in a sustainable manner (recognising that the protection of biodiversity and other maritime users and activities is important), while also enhancing security of energy supply, contributing to climate change goals, and reducing greenhouse gas emissions.

The Draft OREDP II advises that exclusions from the 'Broad Areas' will include High Density Shipping Routes, which occur mainly on the approaches to major ports.

In discussing, opportunities and constraints, it is noted that proximity to onshore infrastructure can support ORE development of ORE, with the significant role for ports and the need for associated infrastructure development, recognised in the Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland (Multi-Port Policy Statement).

An Adaptative Management Plan for the OREDP II includes for a need to consider the impact of climate change and related adaptations, including those for transport infrastructure in coastal locations, such as ports and associated on-shore and off-shore access networks.

Draft National Nature Restoration Plan 2026

[33] Department of Communications, Energy and Natural Resources - Offshore Renewable Energy Development Plan
[34] Offshore Renewable Energy Development Plan Interim Review 2018
[35] Draft Offshore Renewable Energy Develpoment Plan II

Following a consultation process, Ireland was to submit its first Draft National Nature Restoration Plan (DNNRP) to the European Commission By 1 September 2026 to comply with the EU Nature Restoration Law Regulation of 2024 and the subsequent Commission Implementing Regulation of 2025.

In terms of the diversity of our natural environment, our DNNRP recognises that “As an island nation, Ireland relies heavily on the marine area for employment, energy, food and associated resources, leisure, wellbeing and tourism, transport, communications, education, and research. A significant level of culture and heritage is integrally embedded within the national relationship with the marine environment. The transboundary nature of the marine environment requires a coordinated approach to monitoring and management across territorial boundaries ….”

With respect to socio-economic impacts and foreseeable benefits of restoration, the DNNRP recognises the important roles of coastal and marine ecosystems in protecting water quality, biodiversity and assisting in efforts to address climate change; providing the basis for essential Irish economic activities such as fisheries, water quality and tourism; and providing direct benefits through recreation, social connection, and well-being.

Much of the specified coastal marine habitat included in the NRP (e.g. seagrass beds, shellfish beds and some soft sediment areas) are degraded or in poor condition and will require either active or passive restoration, the latter which will involve the reduction or removal of pressures. It is noted that further data on habitats is required to provide a cost-benefit analysis of restoration measures for such habitats, with this area being in need of focus for future work.

The focus in terms of coastal and marine habitats is on restoration of salt marshes, dunes, machair and seagrass beds to address "coastal squeeze" and sea-level rise supporting both blue-carbon sequestration and natural storm-surge buffering for settlements in vulnerable bays such as Dublin. Measures include managed realignment to allow landward habitat migration, dune stabilisation, and seagrass re-seeding.

Alignment between EU and national policies on the marine environment is identified by the DNNRP as needing focus going forward; and it is noted that while inter alia transport infrastructure can place pressure on habitats, avoidance of sensitive sites where possible, nature inclusive design and compensatory restoration can ensure that biodiversity objectives and development targets are achieved together.

With respect to other measures, as discussed above under CAP25 with respect to MPAs, the aim of expanding Ireland’s network of to reach a target of 30% coverage of the maritime area by 2030 is included under the Marine Protected Areas LIFE project, of which the core goal is to “make a major contribution to protecting, conserving and enabling the recovery of Ireland’s marine ecosystems”. The Marine Strategy Framework Directive Marine Strategy Part III: Programme of Measures (PoM) is also identified whereby it forms a central element of Ireland’s commitment to ensuring Europe’s marine waters are “clean healthy, biologically diverse and sustainably used”; actions within the PoM include those relating to Nature-Based Solutions in coastal and marine systems, to protect biodiversity, improve

resilience to climate change and reduce the impact of pollution and guidance on reducing underwater noise pollution to protect marine mammals . Environmental Targets include addressing both existing and emerging pressures, implementing measures to restore ecosystems, and enhancing the condition of the marine environment. The mapping of Ireland's marine ecosystems is also an important measure.

2.5.5 Regional Policy

2.5.5.1 Regional Spatial and Economic Spatial Strategy for the Eastern and Midland Region 2019-2030 & Issues Paper

The Regional, Spatial and Economic Strategy (RSES) for the Eastern and Midland Region[36] including the Metropolitan Area Spatial Plan (MASP) for Dublin was adopted in January 2020 by the Eastern and Midland Regional Authority (EMRA). The RSES is a strategic plan and investment framework to shape the future development of the region to 2031 and beyond.

A key challenge facing the Eastern and Midland Region, along with all other regions, is the transition to a low carbon society. For the RSES this means five primary areas of transition which are at the core of the Strategy:

- *"sustainable development patterns which promote compact growth, reduce transport demand and encourage low carbon transport modes;*
- *sustainable transport systems (people and freight);*
- *carbon storing and sequestering land uses;*
- *energy efficient buildings and industry; and*
- *renewable energy".* (page 23)

The RSES provides for strategies including, *inter alia,* an investment framework to prioritise the delivery of key enabling infrastructure and services by government and state agencies and a climate action strategy to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The RSES, prepared in accordance with the NPF, sets the context for each local authority within the Region to develop county and city development plans in a manner that will ensure national, regional and local plans align. It is guided by a vision statement that reads:

> *"To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all."* (page 6)

[36] Regional Spatial and Economic Spatial Strategy for the Eastern and Midland Region 2019-2030

The RSES provides the basis for the integration of land use and transport planning in the Region, informing the preparation and implementation of plans, programmes and projects at all levels. To achieve this, guiding principles are to be applied in statutory land use plans, taking into consideration the requirements of both urban and rural areas across the Region. These include:

- **A Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **An Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin Metropolitan Area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

Regional Policy Objectives (RPOs) of the RSES include RPO 8.5 on freight transport:

> *"To support the preparation of a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies".* (page 188)

With respect to the profile of the region the RSES notes that the Dublin region is the main global gateway to Ireland, and that there is continued growth both in the volume of imported and exported goods through Dublin Port.

The RSES defines the Dublin - Belfast Economic Corridor, which is contained within the Eastern Corridor (one of three strategic corridors identified), as the largest economic agglomeration in Ireland with Belfast Harbour and Dublin Port among the transport facilities identified therein. The RSES supports the development of the Dublin - Belfast Economic Corridor through targeted investment in transport infrastructure and services complementing and maintaining its function as part of the EU TEN-T core network.

The RSES notes that the Dublin City and Metropolitan Area accounts for about half of the Region's population or a quarter of the national population, as well as being the largest economic contributor in the state. As Ireland's only international city of scale, Dublin acts as the global gateway to Ireland and its influence extends well beyond its administrative boundaries. Growth Enablers for Dublin City and Metropolitan Area include:

> *"Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the Region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus on the Dublin-Belfast Economic Corridor."* (page 34)

The RSES recognises that Ireland's port and shipping services play an important role as enablers of economic growth, noting that the Region is home to the largest seaport in the country, Dublin Port. The RSES states that given the nature and function of ports, combined with the location interfacing with the marine environment, there is potential for environmental conflict with the existing ecosystem. It continues that this sensitivity is further increased by the proximity of most of the Region's ports to designated sites.

To minimise potential impacts on EU protected habitats, the RSES advocates that brownfield port developments which maximise the capacity of existing port sites should be prioritised over greenfield developments.

It continues that the approach to port development in the Region shall adhere to the European Commission guidelines on the Implementation of the Birds and Habitats Directives in Estuaries and Coastal Zones. The commissioning of the National Ports Capacity Study to assess the capacity of the national port network is referenced.

In terms of port facilities, the RSES acknowledges that the NPP and the national hierarchy or tiering of ports recognises the long-term international trend in ports and shipping towards increased consolidation of resources to achieve optimum efficiencies of scale. It notes that this has knock-on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections. The RSES acknowledges that the NPP seeks to ensure that the strategic development requirements of Tier 1 Ports and other ports and harbours are addressed to ensure their effective growth and sustainable development at a national and regional level.

With specific regard to Dublin Port, the RSES notes that it is the largest port in the country handling almost 50% of all Irish foreign trade and that it has seen trade volumes grow by 35.7% over the previous five years. Dublin Port is recognised in this RSES as a critical national facility; a key economic driver for the Region, the nation and an integral part of Dublin City, in line with the Dublin Port Masterplan 2040, as reviewed in 2018.

Regional Policy Objectives (RPOs) guiding the development of ports and specifically Dublin Port within the RSES state:

> *"RPO 8.21: The EMRA will support the role of Dublin Port as a Port of National Significance (Tier 1 Port) and its continued commercial development, including limited expansion and improved road access...*
>
> *RPO 8.23: The EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.*

RPO 8.24: The EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs." (page 190)

To achieve the vision the Dublin Metropolitan Area Strategic Plan (MASP) identifies several Guiding Principles for the sustainable development of the Dublin Metropolitan Area. With respect to Dublin Port these include:

"Dublin as a Global Gateway – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements." (page 95)

In March 2026, the EMRA published an issues paper, the Pre-Draft Public Consultation Strategic Issues Paper (the Issues Paper)[37] to inform the review of the RSES. This Issues Paper confirms that the Eastern and Midland Region has the highest and fastest growing population in Ireland; over 2.5 million people live in the smallest land area of the three regions. 1.5 million of these people live in the Dublin Metropolitan Area. The Region is described as the national economic engine, whith more than 1.3 million jobs and half of the National Domestic Product (NDP) provided here. The importance of the Dublin-Belfast Economic Corridor is highlighted as the largest economic agglomeration on the island of Ireland and forming part of the TEN-T network. The Issues Paper notes that international trade and economic activity that involves moving Irish goods by sea is underpinned by Dublin Port, which is a key logisitics and distribution hub. From an environmental perspective the recognition by UNESCO of Dublin Bay (North Bull Island) as a Biosphere for rare and internatinoally important wildlife and habitats is noted.

The Issues Paper discusses the matters to be considered within the next revision of the RSES under a number of themes; those most relevant to the proposed development are:

- Connectivity and Infrastructure
- Climate and Environment
- Marine Spatial Planning and Coastal Zone Management
- Dublin Metropolitan Area Strategic Plan.

The key issues for Connectivity and Infrastructure for the region include reference to Dublin Port as the largest in the county, handling 80% of cargo freight in the State, and comprising of an international gateway which is key for economic competitiveness in the TEN-T network. In keeping with the provisions of the NPF, the Issues Paper advises that the RSES will:

"support the strategic roles of Dublin Airport and Dublin Port and safeguard these assets as the State's primary international gateways….the review of the RSES provides an

[37] Pre-DRAFT RSES Public Consultation - Strategic Issues Paper | Eastern and Midland Regional Assembly's Consultation Portal

opportunity to reflect on how the wider systems of national and international connectivity operates across different transport modes." (page 24)

For Climate and Environment, it is acknowledged that the new RSES must make provision for marine and coastal matters, facilitating the co-ordination of land-sea interactions and coastal zone management, and responding to sea-level change in a manner that is consistent with the NMPF. Key issues under this theme include the maintenance of water quality, and proactive measures via plan-led adaptation responses to address sea-level rise, coastal flooding and erosion.

Marine Spatial Planning and Coastal Zone Management is an important theme for the region which contains more than 270km of coastline; the coastal and maritime area of the region is described as thriving and bustling. The Issues Paper states that:

"The RSES shall make provision for:

- *A strategy relating to marine and coastal matters that facilitates the coordination of land-sea interactions for coastal planning authorities within the region, and*
- *Coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure".* (page 31)

Further it states that:

"The RSES will support the implementation of the NMPF, the National Marine Policy Statement and the NPF." (page 31)

Integrated land and marine planning are considered necessary to implement sustainable development goals, protect the coast (including the 'Good' environmental status in the marine and coastal environment), support coastal communities and improve their well-being and quality of life, and support the coastal and maritime economy.

Key issues under this theme are identified as including:

- Sustainable Use and Management of Coastal and Maritime Areas
- Climate Resilience (mitigation and adaptation measures will need to be incorporates into the RSES to account for a one metre sea level rise this century; nature-based solutions will be promoted).
- Designated Maritime Area Plans – aligning and supporting the preparation of DMAPs, and the designation of MPAs by 2030.
- Sustaining Coastal Communities and Economies – including supporting necessary infrastructure, the maritime economy and smart specialisation building on strengths.
- Port and Port Infrastructure – *"The RSES will promote the role, function and long-term infrastructural requirements of strategic ports particularly Tier 1 & 2 ports (as per the National*

Ports Policy) linked with the effective growth and sustainable development of the Dublin City Region. The RSES will emphasise the role of ports and port infrastructure in facilitating Offshore Renewable Energy (ORE), its development, maintenance and operation, while ensuring protection of biodiversity." (page 32)

- Electricity Transmission Grid – the need to upgrade and extend onshore, offshore and non-grid infrastructure to enable connections including support for the development of a national sub-sea interconnector around Ireland to allow connection to the European transmission grid.
- Interjurisdictional Coordination and Cooperation - to be supported within the region, on the island, transboundary / with the UK or the EU so that there is coherent planning of the shared sea basin.
- Implementing an Integrated Land and Marine Planning Approach.
- Protecting the Marine Environment – noting the emphasis within the NMPF on avoiding, minimising or mitigating significant adverse impacts on the marine environment.

With respect the review of the Dublin MASP, measures to be included to secure effective implementation and monitoring are listed, which include:

- Indicating priorities for infrastructure of scale, including transportation infrastructure and providing an order of priority for its provision.
- Identifying the investment and actions for different sector which are necessary to deliver the planned growth and development.

Key issues identified include the provision of enabling in and transportation with an undertaking to support Dublin Port as a vital national entry point and logistics hub. The Dublin Bay Biosphere is to be protected and the targets of 'no net loss' with respect to biodiversity are supported.

2.5.5.2 Transport Strategy for the Greater Dublin Area 2022-2042

The Transport Strategy for the Greater Dublin Area, 2022 to 2042[38], prepared by the NTA sets out the manner in which transport will be developed across the Greater Dublin Region (covering Dublin, Meath, Wicklow and Kildare) up to 2042 (GDA Transport Strategy).

The strategy has been developed to be consistent with the spatial planning policies and objectives set out in the RSES. These objectives in turn are consistent with the NPF and the NDP as set out in Project Ireland. This strategy is also based on national policies on sustainability as set out in climate action and low carbon legislation, and in climate action plans.

The strategy highlights that Dublin Airport and Dublin Port are two of the most important economic assets in the State. It acknowledges that it is the responsibility of the NTA, through this strategy, to

[38] Greater Dublin Area Transport Strategy 2022-2042

ensure that the landside transport network meets the requirements of these international gateways. In relation to Dublin Port, while the volumes of passenger trips generated are significantly lower than those generated by Dublin Airport, passenger trips generated by the Port are of primary economic importance. The location of the Port is also a factor which places additional emphasis on the need to cater appropriately for goods vehicles. This strategy incorporates additional road access, protection of the national road network, public transport, HGV management and demand management measures across the city-region which will facilitate more efficient operations of Dublin Port, in tandem with the requirements of the wider city. Additionally, there is a requirement for Dublin Port to be fully integrated into the regional transport system to facilitate passengers who wish to travel by ferry without the use of a private car. Measure INT2 - International Gateways states:

> *"It is the intention of the NTA, in conjunction with public transport operators, TII, and the local authorities, to serve the international gateways with the landside transport infrastructure and services which will facilitate their sustainable operation.*
>
> *Throughout the lifetime of the strategy, the NTA will continue to work with Dublin Port Company, other port and harbour operators and DAA in respect of Dublin Airport, in monitoring, assessing and delivering these transport requirements."* (page 75)

In line with RPO 8.5 of the RSES the NTA supports the development of a strategy for freight transport in recognition of the need to reduce the carbon-intensity of freight movements and be cognisant of the inter-regional nature of freight movements, driven in particular by the scale and strategic importance of Dublin Port and Dublin Airport, along with the high concentration of logistics and industrial activity within the GDA.

It is a key objective of the NPF under NSO 4 - High Quality International Connectivity and the RSES to safeguard and improve access to Dublin Port and Dublin Airport, as two primary national gateways. Measure FREIGHT2 - Strategy for Sustainable Freight Distribution states:

> *"It is the intention of the NTA, in collaboration with other authorities, including TII and Irish Rail, and stakeholders to prepare a Strategy for Sustainable Freight Distribution for the Greater Dublin Area – to inter alia, support the decarbonisation of the freight sector, to seek to further integrate smart technologies in logistics management and to reinforce the important role that the strategic road and rail network play in the efficient movement of freight."* (page 198)

In this regard, the Sustainable Freight Distribution Framework: Greater Dublin Area (GDA) Sprint Report was since been published (July 2021). This framework was created to guide the process of producing the Sustainable Freight Distribution Framework for the Greater Dublin Area, which itself was published in November 2022 (see **Section 2.5.5.3**).

Underpinning the GDA Transport Strategy's measures relating to freight, delivery and servicing, there is an associated requirement by planning authorities in the GDA for the clear identification in

development plans, of appropriate locations for freight intensive developments, and the implementation of Distribution and Servicing Plans for such developments as part of the planning process. Measure FREIGHT3 – Planning Policy and Freight states:

> *"It is recommended that local authorities in the GDA, with the input of the NTA and TII, identify appropriate locations for freight-intensive developments in their Development Plans."* (page 199)

The strategy advises that HGV management proposals may include following in plans:

> *"Ensure that the Dublin Tunnel continues to perform its primary function of providing access to Dublin Port for freight traffic.*
>
> *Provision for appropriate Mobility management planning at key freight intensive locations such as Dublin Port, Dublin Airport and Dublin City Centre."* (page 199/200)

With respect to move of freight by rail Measure FREIGHT5 – Rail Freight commits to supporting the implementation of the outcomes of the Rail Freight 2040 Strategy.

2.5.5.3 Sustainable Freight Distribution Framework: Greater Dublin Area 2022

The Sustainable Freight Distribution Framework: Greater Dublin Area[39] (SFDF) was published by the NTA in November 2022 and sets out an approach to develop a strategy for

> *"the efficient, safe and sustainable movement of goods based around the following key themes; Stakeholder Engagement, Freight Data, Infrastructure, Technology & Decarbonisation and, Operational & Planning Considerations".* (Executive Summary)

The framework outlines a clear approach for the development of a strategy in the future, which aligns with:

- "An Enhanced Natural and Built Environment;
- Connect Communities and Better Quality of Life;
- A Strong Sustainable Economy; and
- An Inclusive Transport System." (page 56)

[39] Sustainable Freight Distribution Framework

2.5.6 Local policy

2.5.6.1 Dublin City Development Plan 2022-2028 (as varied)

The Dublin City Development Plan 2022-2028 (as varied)[40] (the Development Plan) is the primary statutory land-use planning policy document guiding development within Dublin City. The subject site is wholly situated within the boundaries of Dublin City. The Development Plan is emphatically supportive of the role that Dublin Port plays in the city and the country.

Chapter 4 – Shape and Structure of the City under Section 4.5.1 (Approach to the Inner City and Docklands) of the Development Plan recognises and outlines general support for the activities of Dublin Port:

> *"Dublin City Council fully supports and recognises the important national and regional role of Dublin Port in the economic life of the region and the consequent need in economic competitiveness and employment terms to facilitate port activities. Dublin Port will have a significant role to play in the future development and growth of the city and it is considered prudent to plan the structure of this part of the city, including the proposed public transport network, to fully integrate with the developing city structure and character, while having regard to the Dublin Port Company Masterplan 2012-2040."* (page 113)

The Development Plan states that is the policy of Dublin City Council:

> *"SC7: To support and recognise the important national and regional role of Dublin Port in the economic life of the city and region and to facilitate port activities and development, having regard to the Dublin Port Masterplan 2040."* (page 115)

In Chapter 6 which sets out policy for the City Economic and Enterprise, the Development Plan acknowledges that:

> *"Dublin Port continues to modernise and consolidate its operations with the company making considerable infrastructural investment at the port to facilitate larger vessels and provide for increased capacity" (page 178) and "is a major transport and logistics hub with Dublin Port providing a direct trading route to the UK and Continental Europe"*. (page 189).

The Development Plan acknowledges that as Ireland is an export-driven economy on the periphery of Europe the transport and logistics sector is a significant and growing sector in Dublin, noting that logistics and storage is expected to be the fastest growing employment sector in Dublin over the coming decade. In this regard, Dublin Port is accepted as being a particularly important element of the city's transportation and logistics infrastructure and continues to play a significant role in the economy of the

[40] Dublin City's Development Plan 2022-2028 | Dublin City Council

city, handling almost half of all trade in the Republic of Ireland and is a key strategic access point for Ireland and the Dublin area.

The Development Plan notes the DPC Masterplan 2040 and the important role that Dublin Port will continue to play in the future development and growth of the City. The Development Plan notes the key objective in the Masterplan 2040 and to reintegrate the Port with the City and to create a unique fusion between the working port and the living city. This is confirmed by Policy CEE35 which states:

> *"To recognise that Dublin Port is a key economic resource and to have regard to the policies and objectives of the Dublin Port Masterplan 2040 including the reintegration of the Port with the City."* (page 199)

2.5.6.1.1 Land Use Zoning

The strategic approach to zoning of the Development Plan includes the following principle:

> *"To ensure that land is appropriately zoned in order to accommodate the expected growth needs of Dublin City within the lifetime of the plan and to ensure the protection of community and social infrastructure, and critical ecosystems services, through the application of appropriate land-use zoning designations in order to provide adequate facilities and amenities to meet the growing needs of the city".* (page 527)

Map F of the Development Plan indicates the land use zoning objectives pertaining to the development site. See **Figure 2-6** to **Figure 2-7**.



Figure 2-6: Contextual extract from Zoning Map F of Dublin City Development Plan 2022-2028

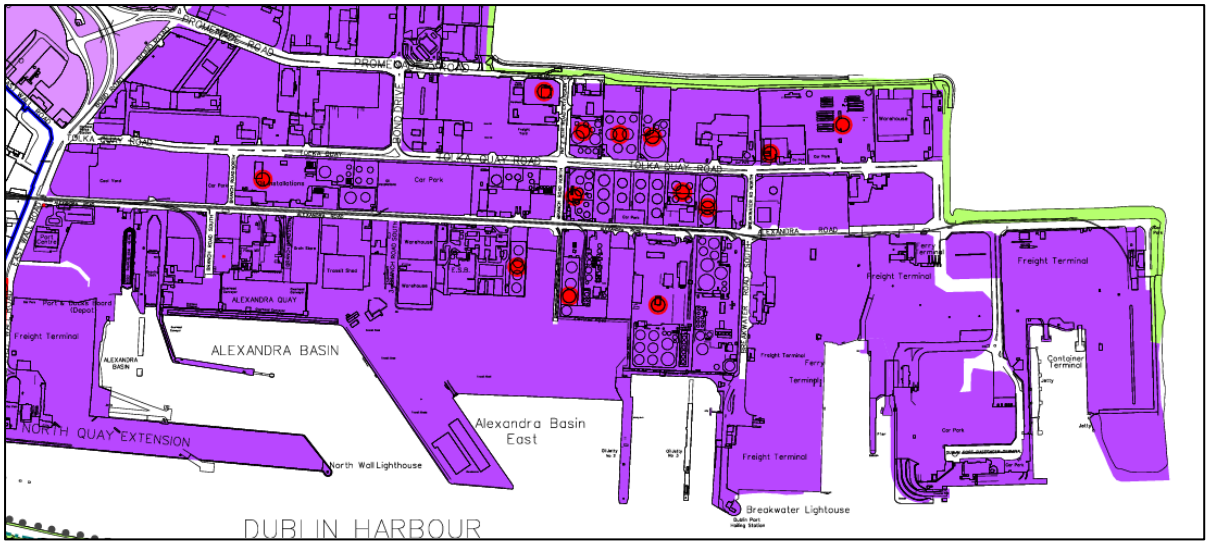


Figure 2-7: Localised extract from Zoning Map F of Dublin City Development Plan 2022-2028

On the maps shown above, lands shaded purple are zoned for *'Employment (Heavy)'* uses and lands in light green are zoned for *'Amenity / Open Space Lands / Green Network'* usage. The greater area of the land section of the site is shaded purples with a small area at the eastern extent of site shaded light green. The zoning objectives for these areas will be discussed below.

Areas within the marine section of the site are shown as white and are described within the Development Plan as *'unzoned lands'*. With respect to such lands, the Development Plan states:

> *"Certain small areas of land within the city are unzoned or not covered by a specific zoning objective. These lands are illustrated in white on the zoning maps accompanying the plan and usually correspond with the location of the city's roads, bridges, train lines, or other key infrastructure installations. Development proposals in respect of these unzoned lands will be considered in accordance with the policies and objectives of the plan. Regard will also be had to their compatibility with adjacent land-uses and zonings."* (page 528)

The zoning objective for 'Employment (Heavy)' uses (Zone Z7) is:

> *"To provide for the protection and creation of industrial uses, and facilitate opportunities for employment creation including Port Related Activities. The majority of these lands are located in the Port area and at the Diageo/Guinness complex … The primary uses in these areas are those that can result in a standard of amenity that would not be acceptable in other areas. Such activities include industry (other than light industry), manufacturing, repairs, open storage, waste material treatment, utility operations, and transport operation services. These areas require a measure of protection from other non-compatible uses as this can result in conflict and limit the expansion or adaption of the primary use in the area..."* (pages 537-538)

Permissible uses include chemical processing and storage, civic and amenity/recycling centre, cruise shipping and marine services (in port area and ancillary services), general industrial uses, heavy vehicle park, household fuel depot, industry (light), office, open space, outdoor poster advertising, petrol station, port-related industries and facilities, public service installation, scrap yard, storage depot (open), transport depot, warehousing. Uses open for consideration include buildings for the health, safety and welfare of the public, car park, car trading, community facility, crematorium, cultural/recreational building and uses and training centres.

The zoning objective for *'Amenity/Open Space Lands/Green Network'* (Zone Z9) uses is:

> *"To preserve, provide and improve recreational amenity, open space and ecosystem services. Z9 lands are multi-functional and central to healthy place-making, providing for amenity open space together with a range of ecosystem services. They include all amenity, open space and park lands, which can be divided into three broad categories of green infrastructure as follows: public open space; private open space; and, sports facilities. The provision of public open space is essential to the development of a strategic green infrastructure network… The role of Z9 lands in providing ecosystem services, such as improved biodiversity and ecological connectivity, nature-based surface water management, flood attenuation, river corridor restoration and climatic resilience, is also increasingly being recognised. Generally, the only new development allowed in these areas, other than the amenity/recreational uses, are those associated with the open space use. These uses will be considered on the basis that they would not be detrimental to Z9 zoned lands…"* (page 539)

Permissible uses within such lands include open space and public service installations. Uses open for consideration include car parks for recreational purposes, civic and amenity/recycling centre, community facility, cultural/recreational building and uses, restaurant, sports facility and recreational uses, and water-based recreational activities. Zone Z9 lands lie outside the red line boundary with the closest location lying immediately to the north and west at Alexandra Road.

Other symbols shown on **Figure 2-2** and **Figure 2-3** above include red dots which indicate COMAH establishments (Seveso establishments) (see COMAH Establishments section below) and red asterisks which indicate the presence of a structure on the Record of Protected Structures (See Built Heritage section below).

2.5.6.1.2 COMAH Establishments

Appendix 8 of the Development Plan provides a list of Seveso sites in Dublin city, including their respective consultation zones. Activities are listed in an *'Upper Tier'* and others in a *'Lower Tier'*.

Those closest listed to the development site include:

- Upper Tier: Calor Teoranta and Indaver Ireland Ltd on the Tolka Quay Road, Valero Energy Ireland on Alexandra Road and Circle K Ireland Holdings Ltd and Tedcastles Oil Products on the Promenade Road (all Dublin Port).
- Lower Tier: Iarnród Éireann on Alexandra Road.

There are also Upper Tier establishments listed as located on the Port's South Estate which are the National Oil Reserves Agency Ltd. (NORA) at Shellybanks Road, Ringsend and the associated tank farm, Poolbeg Tankfarm, at Pigeon House Road, and a Lower Tier establishment, Synergen Ltd. t/a ESB Dublin Bay Power, at Pigeon House Road.

Policy SI44 of Dublin City Council states:

> *"COMAH Establishments/SEVESO*
>
> *To have regard to the provisions of the SEVESO III Directive (2012/18/EU) relating to the control of major accident hazards involving dangerous substances and its objectives to prevent major accidents and limit the consequences of such accidents. Dublin City Council will have regard to the provisions of the Directive and recommendations of the HSA in the assessment of all planning applications located on, or impacted by, COMAH establishments in accordance with Guidance on Technical Land-use Planning Advice: for planning authorities and operators of COMAH establishments (2021)."* (page 294)

2.5.6.1.3 Flood risk

Much of proposed development site is in Flood Zone A or B as identified within the Strategic Flood Risk Assessment for the Dublin City Development Plan 2022-2028 (See **Figure 2-8** below).

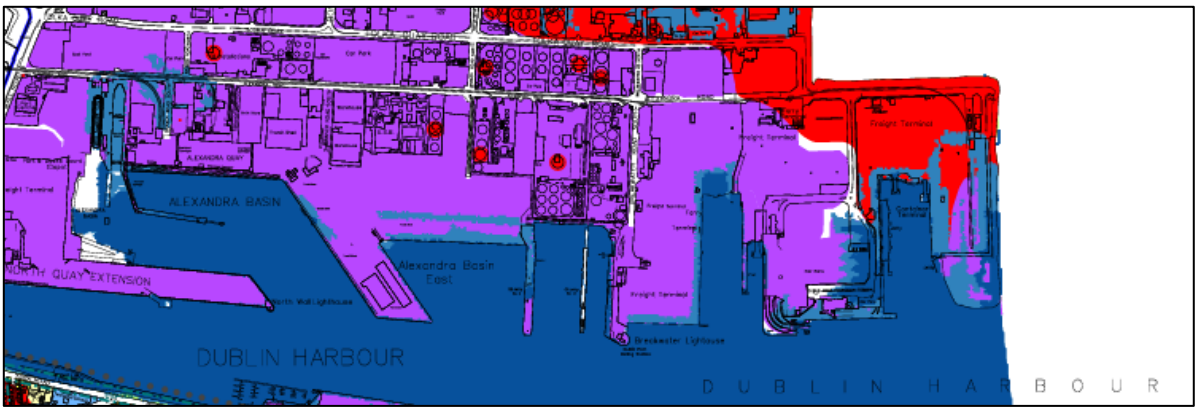


Figure 2-8: Flood zones as per Map F of the Strategic Flood Risk Assessment for the Dublin City Development Plan 2022-2028.

Those areas shown dark blue on **Figure 2-4** are located within Flood Zone A; those shown lighter blue are located within Flood Zone B; and those shown red are advised to be defended against flooding.

The policy and development management standards of the Development Plan require that a site-specific flood risk assessment is undertaken for any development within Flood Zones A or B which should demonstrate compliance with The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009). The Flood Risk Assessment is included in Chapter 9, Section 9.3. The assessment should take account of climate change and include site specific mitigation measures, flood-resilient design and construction, and any necessary management measures.

2.5.6.1.4 Contamination

The Development Plan includes policies and objectives with respect to the management of contaminated land and material, some of which have arisen due to a history of heavy industrial uses.

Policy SI33 requires that potentially contaminated sites are to be remediated to internationally accepted standards. This predominantly relates to brownfield lands that are to be redeveloped. It is note that contaminants will need remediation measures that may require a licence from the EPA.

Objective SIO19 advises that the local authority will liaise with the Regional Waste Management Office in the case the off-site disposal of contaminated waste is required.

Objective SIO20 seeks to proactively manage contamination risk from existing infrastructure by encouraging upgrades or replacement and remediation of affected sites, where appropriate.

2.5.6.1.5 Built Heritage

The Development Plan states that works to a protected structure must be of the highest standard and demolition of a Protected Structure, including structures within its curtilage is only permissible *"in exceptional circumstances"*. Structures included on the Record of Protected Structures are identified on Map E and F of the Development as red asterisk. The Record of Protected Structures is included as Volume 4 of the Development Plan. Policies relevant to Protected Structures include:

> *"BHA2 Development of Protected Structures*
>
> *That development will conserve and enhance protected structures and their curtilage and will:*
>
> *(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.*
>
> *(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
>
> *(c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.*

(d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.

(c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure.

(d) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.

(e) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the protected structure.

(f) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.

(g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development.

(h) Have regard to ecological considerations for example, protection of species such as bats. BHA3 Loss of Protected Structures That the City Council will resist the total or substantial loss of protected structures in all but exceptional circumstances." (page 349)

The Development Plan supports industrial heritage through advocating for reuse in an appropriate fashion, such as for cultural purposes. Policy BHA16 states:

"To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City." (page 362)

Record of Monuments and Places (RMP) as Established under Section 12 of the National Monuments (Amendment) Act 1994 are indicated on Maps E and F as a dashed grey line and castle symbol. Policy BHA26 Archaeological Heritage states:

"1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.

2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of

light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.

3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.

4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.

5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.

6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.

7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.

8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland" (page 372-373)

The majority of sites and features recorded on the landside of the ABR Project, as consented in 2015, are of relatively modern date, dating from the 19th century and more recently, and refer to the Industrial Heritage of the river and the Port. Many of these structures were recorded on cartographic evidence only and did not present as upstanding remains. The North Wall Quay Extension is the largest upstanding cultural heritage item within Alexandra Basin West, and was not a protected structure when the ABR Project was submitted in 2014.

2.5.6.1.6 Development Management Standards

The development management standards also require that planning applications are supported by the necessary analysis and documentation to demonstrate the proposed design and rationale for a scheme. Such requirements include the preparation of a noise assessment for any noise generating activities (refer to Chapter 12), site specific flood risk assessments for sites within Flood Risk Zones A and B (refer to Chapter 9, Section 9.3), site investigation reports where contamination occurs (refer to Chapter 8) and an ecological impact assessment for certain developments (refer to Chapter 7), along with appropriate assessment and / or environmental assessment where required (refer to Report to Inform Appropriate Assessment (RIAA) and Natura Impact Statement (NIS)).

Demolition/renovation/refurbishment projects that generate more than 100m^3 in volume of Construction and Demolition (C&D) waste; and civil engineering projects which generate in excess of 500m^3 of waste materials used for development works on the site must be accompanied by a Construction Management Plan. This should cover among other items, traffic management, waste management, environmental impacts such as noise, air quality, vibrations and any other relevant detail. Where appropriate, excavated material from development sites is to be reused on the subject site according to the Development Plan.

The development management guidelines specific to Dublin Port outline several considerations with which the planning authority examine during the assessment of proposals within Dublin Port, and include:

- *"Recognition of the important role of Dublin Port in the economic life of the city and the region and the consequent need in economic and employment terms to facilitate port development*
- *The periphery of the port area facing residential areas shall be designed and landscaped to minimise the impact of its industrial character*
- *The impact on nature conservation, recreation and amenity use, and other environmental considerations, including having regard to the designation of Dublin Bay as a UNESCO biosphere and other environmental designations such as Special Area of Conservation (SAC) and Special Protection Area (SPA)*
- *The protection of the amenities of residential and commercial uses in adjoining areas*
- *Design criteria including appropriate landscaping, finishes, signage, boundary treatments and site layout where development adjoins residential and commercial uses"* (page 650)

With respect to Green Infrastructure, noting the zoning objective in the north eastern corner of the site, the standards seek support for this network including inter alia a provision for public access, increased

connection for pedestrians and cyclists, and a need to ensure that proposed development does not create negative impacts on the existing network.

2.5.6.2 Climate Neutral Dublin 2030 – Local Authority Climate Action Plan 2024-2029

Climate Neutral Dublin 2030 (CND2030)[41] is the second local authority climate action plan prepared by Dublin City Council. It sets out actions to be taken to prepare Dublin City and its population for the known impacts of climate change including flooding, sea level rise, and extreme weather events. Primarily the actions relate to mitigating greenhouse gas emissions and contributing towards a global effort to limit warming to below 1.5 degrees.

CND2030 has three interdependent targets which include a 51% reduction in greenhouse gas emissions by 2030, striving for neutrality before 2050; having a Climate Resilient City prepared for the known and unknown impacts of climate change and ensuring a 'Just Transition' to seek to ensure that actions taken do not cause harm where possible.

The actions identified will be implemented by Dublin City Council with support from other stakeholders as appropriate. There are no specific actions identified in the area of the proposed development. The action most relevant to DPC is the inclusion of other areas of Dublin Port (south of the Liffey) within the Ringsend-Poolbeg Decarbonisation Zone.

2.5.7 Dublin Port Masterplan 2012-2040

The Dublin Port Masterplan 2040[42] is a key document guiding future development within the Port up to 2040. The Masterplan is a non-statutory plan which has been framed within the context of EU, national, regional and local development plan policies and is explicitly endorsed (or is expressly recognised) in the NPP, NMPF, NDP, RSES for the Eastern and Midland Region, Dublin City Development Plan 2022-2028, North Lotts and Grand Canal Dock Planning Scheme and Poolbeg West Planning Scheme.

The Masterplan presents a vision for future operations at the Port and critically examines how the existing land use at Dublin Port can be optimised for trade and passenger throughput. The Masterplan was prepared by DPC in order to:

- *"Plan for future sustainable growth and changes in seaborne trade in goods and passenger movements to and from Ireland and the Dublin Region in particular.*
- *Provide an overall context for future investment decisions.*
- *Reflect and provide for current National and Regional Guidelines and initiatives.*

[41] DCC Climate Neutral Dublin 2030
[42] DPC Masterplan 2040 Reviewed 2018

- *Ensure there is harmony and synergy between the plans for the Port and those for Dublin City, the Dublin Docklands Area and neighbouring counties within the Dublin Region.*
- *Give some certainty to customers about how the Port will develop in the future to meet those requirements"* (page 14)

Between the publication of the Masterplan in 2012 and 2017, Dublin Port experienced particularly high rates of trading growth and traffic growth with volumes of traffic increasing by 30.1% in those five years to 2017. In light of same, a review of the Masterplan took place in 2017-2018. The review concluded that:

- An eastern expansion of Dublin Port into Dublin Bay is no longer viable and is not being pursued as an option.
- To meet anticipated capacity requirements Dublin Port needs to be developed based on an average annual volume growth of 3.3% over the 30 years from 2010 to 2040 rather than the 2.5% originally assumed in 2012.

The Dublin Port Masterplan 2040 (as reviewed 2018) sets out options for the development of Dublin Port which will meet these requirements and objectives. These options are shown in **Figure 2-9**.

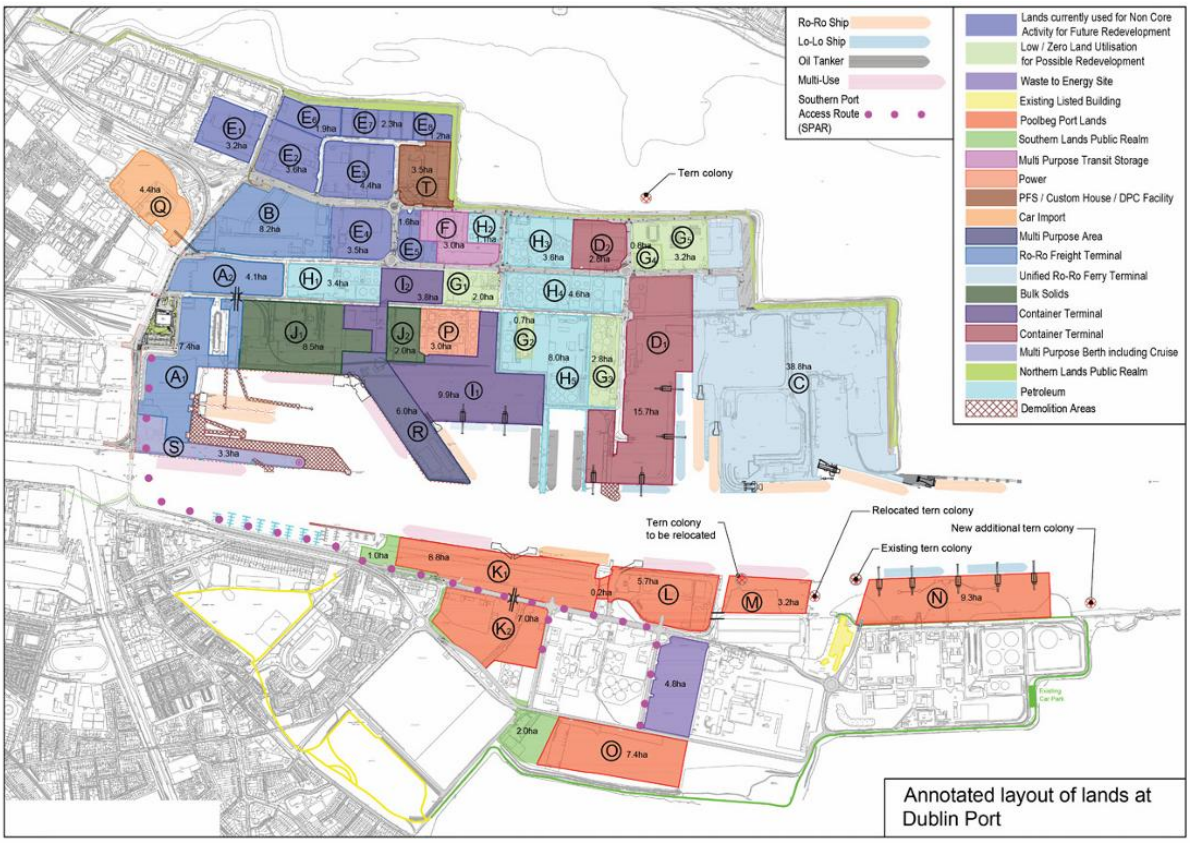


Figure 2-9: Dublin Port Masterplan 2040 Reviewed 2018 Map Extract

The ABR Project was generally located within the North Estate of DPC. As per **Figure 2-5** above. The Masterplan sets out the infrastructure development options as follows:

- A: Ro-Ro Freight Terminal:

  *"This area is the redeveloped and expanded Terminal 4 which is being constructed as part of the ABR Project and which will provide capacity primarily for unaccompanied Ro-Ro freight on services between Dublin and Liverpool"***.** (page 48)

  This element was completed as part of the ABR Project.

- S: Multi-Purpose Berth including cruise[43]:

  "This area is being redeveloped as part of the ABR Project to provide multi-purpose facilities for cruise ships, trade vehicle imports, project cargoes and lay-by berths". (page 50)

  The provision of multi-purpose facilities was ultimately omitted from the planning permission for the original ABR Project (as amended by An Coimisiún Pleanála in July 2025). The dredging of Alexandra Basin West was not completed and forms part of the proposed ABR2 Project.

- J: Bulk Solids:

  *"The use of lands in this area for Bulk Solid cargoes will be kept under review. In general, the Bulk Solid commodities shipped through Dublin Port are ex-growth. Some specific commodities may, over the remaining period of the Masterplan, decline to zero. With the possible exception of imported biomass for power generation, DPC will not seek to replace declining bulk commodities with other bulk commodities and will instead look for opportunities to redevelop bulk facilities to provide additional land area for unitised trades (Ro-Ro and Lo-Lo)"***.** (page 49)

  A multipurpose berth was completed as part of the ABR Project. The dredging of Alexandra Basin West was not completed and forms part of the ABR2 Project.

- R: Multi-Purpose Area:

  "This area is being redeveloped as part of the ABR Project to provide multi-purpose facilities for unitised trade (both Ro-Ro and Lo-Lo), for other cargo modes (including bulk solid and project cargoes) and for other uses (including cruise ships and lay-by berths)". (page 50)

  This element was completed as part of the ABR Project. The dredging of Alexandra Basin West was not completed and forms part of the ABR2 Project.

- C: Unified Ro-Ro Ferry Terminal:

  "It is proposed to create a Unified Ferry Terminal which would incorporate the existing Terminals 1, 2 and 5. In doing this:

[43] Cruise traffic facility no longer included.

• Existing internal roadways would be eliminated and existing buildings would be removed to create an additional three hectares of usable terminal area.

• A new single set of in-gates would be provided north of the existing terminal areas accessed from the new Promenade Road Extension to be built as part of the project to redevelop the Port's internal road network.

• A new jetty would be built at the eastern end of the Port to provide a fifth Ro-Ro berth

• A new ferry terminal building would be provided to the north overlooking the Tolka Estuary.

• In developing the new Unified Ferry Terminal, necessary State facilities would be provided for border controls by a range of State agencies". (page 48)

The infill of the basin and raising of levels at Terminal 5 were permitted as part of the ABR Project but were not completed. The previously permitted infill works and the raising of levels now form part of the proposed ABR2 Project. This development will facilitate the completion and efficient operation of the Unified Ferry Terminal which us an integral component of the permitted MP2 Project.