

Environmental Impact Assessment Report

## Chapter 3

# Consultation and Project Scoping

Volume 2 Part 1



## 3 CONSULTATION & PROJECT SCOPING

### 3.1 Introduction

The 3FM Project is the third and final Strategic Infrastructure Development (SID) Project to be brought forward for development consent from the Dublin Port Masterplan 2040, as revised in 2018. The evolution of the 3FM Project to its current form reflects the extensive consultation processes undertaken, initially in the preparation of the Masterplan, and latterly in the context of this specific project. The process of consultation has enabled Dublin Port Company (DPC) to obtain opinions on general development options for the port and allowed DPC to consider different perspectives in the initial stages of the project and throughout its development.

This EIAR provides evidence of meaningful and effective consultations which have already taken place and provides the basis for future consultation.

Rather than seek a formal or statutory scoping opinion from a competent authority, DPC opted, in accordance with good practice, to voluntarily scope the contents of this EIAR by engaging in consultation with prescribed and statutory bodies, with other stakeholders, and with the public. DPC's scoping was undertaken in accordance with the European Commission's 2017 "Environmental Impact Assessment of Projects Guidance on Scoping", which states:

*"It is good practice to carry out Scoping even if it is not required by legislation: Developers should endeavour to include a Scoping stage in their work programme for EIA, so that all of the concerns can be identified and addressed during the Scoping stage. "*

The purpose of the EIA scoping process is to identify the issues which are likely to be important during the EIA and to eliminate those that are not relevant. The scoping process identifies the sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors which are likely to be affected. It defines the appropriate level of detail for the information to be provided in the EIAR. The primary focus of scoping is to define the most appropriate assessment of significant effects related to the proposed project.

The consultation and scoping process has resulted in an iterative design procedure, such that the project has been modified to address the issues raised by statutory consultees, stakeholders and the public.

### 3.2 Consultation and the Masterplan Review

In 2017, DPC commenced a review of the Dublin Port Masterplan 2040 (the Masterplan). When adopted in 2012 the Masterplan made provision for periodic reviews to take account of changes in demand for the use of port facilities and developments in port operations.

The first review of the Masterplan in 2017 involved a detailed public consultation process aimed at securing views from relevant stakeholders whose perspectives on the port are important.

The consultation process took place in two distinct stages:

### 3.2.1 Stage 1: 2017 Masterplan Review Consultation Process

The 2017 Masterplan Review consultation process ran from January 2017 to March 2017 and involved the following elements:

- The publication of a detailed Masterplan Review 2017 Consultation Paper, outlining the issues that were being taken into consideration in the context of the review of the Masterplan;
- The initiation of a formal consultation process to secure submissions on the Masterplan Review;
- Extensive face to face briefings with key stakeholders prior to the launch of the Masterplan Review 2017 Consultation Paper;
- Presentations to the Central and South East Local Area Committees of Dublin City Council on the review of the Masterplan;
- A comprehensive media campaign surrounding the Masterplan Review designed to generate interest and encourage participation in the master planning process;
- A public information campaign including advertisements, door to door leaflet drops and an information briefing published for local residents and stakeholders;
- Briefings with DPC staff on the review of the Masterplan and an information display for the duration of the consultation period at the office of DPC with all materials available for staff and visitors to inspect;
- Social media campaign to raise awareness, engagement and attendance across Facebook and Twitter channels;
- A Street Team active over two days in areas directly adjacent to Dublin Port distributing 6,000 flyers, placing 300 posters and visiting over 260 individual commercial premises;
- The publication of a Masterplan Review 2017 Environmental Report Consultation Paper by RPS Consultants in January 2017; and
- A series of events including:
  - Local community briefings at Clontarf, East Wall and Ringsend;
    - (Clontarf Public Information Day held at Scoil Uí Chonaill GAA Club, 13th February 2017).
    - (East Wall Public Information Day held at Sean O'Casey Community Centre, 15th February 2017).
    - (Ringsend Public Information Day held at Clanna Gael Fontenoy GAA, 16<sup>th</sup> February 2017).
  - Direct briefings with a selection of community and environmental groups.

The 2017 consultation process led to a high level of participation from stakeholders with 130 people attending community briefings. There were 67 formal written responses received from a broad range of respondents including individuals, residents' groups, commercial interests, statutory bodies and environmental entities.

Following the 2017 consultation process, a detailed report outlining the responses to the consultation process was prepared. This Report can be accessed on the Dublin Port website ([www.dublinport.ie](http://www.dublinport.ie))

As a consequence of the 2017 consultation process, a number of specific issues and observations emerged from the submissions and responses received which fed into the Masterplan Review Process in several ways. DPC decided to initiate a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) of the proposals to revise the Masterplan. RPS was commissioned by DPC to carry out these assessments in the following stages:

- I. The first stage of the SEA process was Screening, to determine if the Masterplan Review required an SEA. The initial output of the first stage was the SEA Screening Report, which was circulated in May 2017 to the statutory consultees for SEA in Ireland, being the Environmental Protection Agency (EPA), Department of Housing, Planning and Local Government (DHPLG), Department of Communications, Climate Action and Environment (DCCA), Department of Agriculture, Food and Marine (DAFM), and Department of Culture, Heritage and the Gaeltacht (DCHG). The SEA Screening Report introduced the potential for development of port lands on the north side of the River Liffey as part of the overall Masterplan, including the MP2 Project.
- II. The second stage of the SEA process was Scoping, which was to provide sufficient information on the Masterplan 2040 to enable the consultees to form an opinion on the appropriateness of the scope, format, level of detail, methodology for assessment and the consultation period proposed for the SEA Environmental Report. This SEA Scoping Report was circulated to the statutory consultees for SEA in Ireland in August 2017 as well as the appropriate authorities in the UK to elicit their view on any potential transboundary environmental effects. A scoping workshop was held in September 2017 to allow for statutory consultees to participate in the scoping phase of the Masterplan 2040. A revised scoping report was developed to incorporate comments received from this workshop as well as those received during the statutory consultation period. Non-statutory stakeholders who were provided with the revised Scoping Report on 24<sup>th</sup> November 2017 and all information was made publicly available on the DPC website. Non-statutory stakeholders who were provided with the SEA Scoping Report for comment were the Department of Transport, Tourism and Sport (DTTAS), Dublin City Council (DCC), Office of Public Works (OPW) including the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Project, Electricity Supply Board (ESB), National Transport Authority (NTA), Inland Fisheries Ireland (IFI), Transport Infrastructure Ireland (TII), Bird Watch Ireland, Local Residents Associations, Local Amenity Groups, Dublin Port Tenants, The Heritage Council, An Taisce and the Irish Nautical Trust. The SEA Scoping Report again introduced the potential for development of port lands on the north side of the River Liffey including the MP2 Project as part of the overall Masterplan and introduced the concept of the phasing of developments that would be proposed by the Masterplan.
- III. A strategic Transportation Study was commissioned to determine how enhanced connectivity between the North and South Port areas could be provided and explore connectivity for different transport modes within the Port Estate in a context that is compatible with existing transportation strategies.
- IV. The existing Soft Values Programme of DPC was reviewed to determine opportunities for enhanced accessibility and integration between the port and the city.

- V. The approach of DPC to protecting and promoting cultural heritage and leisure aspects relevant to the port was assessed to determine how best to facilitate both elements in the context of future developments at the port.
- VI. Additional meetings were arranged between DPC and a number of stakeholders who raised specific issues.

### 3.2.2 Stage 2: 2018 Masterplan Review Consultation Process

In 2018, DPC undertook a further consultation process concerning the Masterplan which involved:

- Publication of a SEA Environmental Report and a Natura Impact Statement (NIS) on the draft Dublin Port Masterplan 2040, reviewed in 2018. These environmental assessments compared the original Masterplan proposals published in 2012 to revised proposals that would enable Dublin Port to meet the then anticipated throughput of 77 million tonnes per annum by 2040. [Following a permanent loss of 7ha of port land to State Services in the North Port, primarily for the Office of the Revenue Commissioners Customs Division as a result of Brexit, and a consequential loss of Port capacity, the throughput of cargo per annum is now estimated at 73.8m tonnes by 2040.] The revised proposals comprised:
  - Two significant SID Projects within the North Port Estate: the Alexandra Basin Redevelopment (ABR) Project, already at construction phase; and the MP2 Project in combination with improvements to the internal road network;
  - The development of Dublin Inland Port; and
  - A third significant SID Project within the South Port (3FM Project).
- The SEA found these revised development proposals, including the 3FM Project, to have significantly less environmental impact compared to the original Masterplan which maintained an aspiration to infill 21 ha of the Tolka Estuary. This is because the Dublin Port Masterplan 2040, reviewed in 2018, focusses instead on the redevelopment of existing port infrastructure on brownfield sites already in operation within Dublin Port, rather than expanding into the Tolka Estuary.
- The draft Dublin Port Masterplan 2040, reviewed in 2018, along with the associated SEA Environmental Report and NIS were completed and circulated in April 2018 to the Irish and UK statutory consultees for SEA. A public notice was placed in the National Press and on the DPC's website to notify the public about the draft Dublin Port Masterplan 2040, SEA Environmental Report and NIS, and to request comments and observations on the contents of those documents. The consultation phase was open to responses from 17<sup>th</sup> April 2018 to 25<sup>th</sup> May 2018.
- A national and local media campaign in July 2018 formally announcing the publication of the final Dublin Port Masterplan 2040, with a social media campaign running in tandem.

The 2018 Masterplan Review consultation process drew 12 responses from a range of stakeholders, including residents' groups, statutory authorities, individuals and commercial organisations. Whilst no specific issues were raised with regard to proposed infrastructure within the South Port (3FM Project), the consultation responses

have nevertheless provided an overarching context to the scoping of environmental issues to be addressed with this EIAR.

### 3.3 Consultation and the Dublin Port Post-2040 Dialogue Papers

A series of Dialogue Papers were developed from September to November 2020 by DPC. These Dublin Port Post-2040 Dialogue Papers present DPC's views on the nature and scale of the development that might be required by 2040. The views are founded on the implicit acceptance of the development path set out in the Dublin Port Masterplan 2040, to continue to develop Dublin Port at its current location until it reaches full capacity and to continue to operate this capacity long after 2040. These views are set out in a series of seven papers based on the detailed knowledge and understanding developed within DPC in recent years through the delivery of major infrastructure projects and intensification of use in Dublin Port. These papers are titled as follows:

1. Why Dublin Port is where it is.
2. How have other European port cities developed?
3. The shaping of Dublin Port in the nineteenth century.
4. An overview of the calls to move Dublin Port.
5. The conundrum of planning for long-term growth.
6. What would moving Dublin Port involve?
7. Options for the greenfield development of additional east coast port capacity

The papers established that, once Dublin Port has reached its capacity limit, by 2040 at the latest, any continued growth in port volumes after that will require additional facilities at another east coast location, either by the greenfield development of a new port, expansion of other existing ports or by a combination of both.

The development of substantial new greenfield port capacity will be a major and challenging undertaking and, based on the experience of major infrastructure projects both in Ireland and elsewhere, will take a long time to complete.

As a result of the extended timescale necessary for such a major infrastructure project in Ireland, DPC believes that it is prudent to plan on the basis of a 20-year time horizon.

There have been occasional suggestions for many years that Dublin Port should be moved from its current location. DPC has consistently rejected this idea on grounds of cost, regulatory challenges, planning difficulties, environmental impacts, and remoteness from the market that Dublin Port serves. Moving the Port also runs entirely contrary to a wide range of national and EU strategies and policies, including the National Port Policy and EU Regulation 1315/2015 (establishing the Trans-European Transport Network).

The Dublin Port Post 2040 Dialogue provided detailed and, at times, technical explanations of DPC's thinking. These were presented as a challenge to those with alternative views on DPC's development path. DPC invited

others to critique the company's thinking by way of substantive papers setting out the rationale for their alternative viewpoints.

The seven papers and supporting technical reports were published on the following website to seek the views of interested parties and the general public:

<https://www.dublinport.ie/dublin-port-publishes-post-2040-dialogue-papers>

The website was advertised through the following channels:

- A formal media announcement which appeared in news outlets from 23<sup>rd</sup> March 2021;
- Eamonn O'Reilly (former CEO of DPC) engaged in a round of media/press briefings around the time of the formal media announcement;
- Newspaper advertisements were published in the national and local print media: The Irish Times on 23<sup>rd</sup> March 2021; and the Northside People and Southside People on 31<sup>st</sup> March 2021;
- In June 2021, DPC used its social media channels to issue reminders that DPC were seeking public submissions in response to the Dublin Port Post 2040 Dialogue Papers; and
- The boating/sailing community were made aware by a contribution from Michael McKenna, DPC Harbour Master on the popular maritime podcast, "Wavelengths": <https://soundcloud.com/afloatirl/dublin-ports-capt-michael-mckenna>

There was significant public interest in viewing the website:

- 485 people visited the website from 19 countries;
- 2,296 page views;
- 693 views of DPC papers;
- 315 views of background documents;
- 817 PDF downloads (events);
- Top download: 136 – 'Why Dublin Port is where it is' – top interest was in Paper 1;
- Low download: 2 – 'DP2 Bremore Cost Estimate' – lowest interest was in Paper 7; and
- Traffic to site peaked on 23<sup>rd</sup> March 2021 following the press release: 94 users; 294 page views; and 150 PDF downloads.

There were 20 submissions received in response to the Dublin Port Post-2040 Dialogue website which were uploaded to the website under 'Responses'.

Following a review of the responses, DPC has no doubt that the development path set out in the Masterplan 2040 is the correct one. Analysis of the issues raised by the seven papers leads to the following conclusions:

1. DPC must complete all of the projects outlined in Masterplan 2040 to deliver infrastructure with an annual throughput capacity of 73.8 million gross tonnes by 2040.
2. This will require the necessary development consents to be secured for the 3FM Project.

3. The achievement of a throughput of 73.8 million gross tonnes per annum by 2040 will require not only the completion of all of the infrastructure projects in Masterplan 2040, but it will also require that the efficiency of port operations greatly increases so that port infrastructure is utilised to its maximum. This will require the elimination of systemic inefficiencies in existing supply chain operations.
4. Over the next 20 years, additional capacity at other existing east coast ports will be required so that, as Dublin Port approaches its ultimate capacity, volumes which Dublin cannot handle can be accommodated elsewhere.
5. During these 20 years, DPC will need to work on a project to construct a new port facility on the east coast of Ireland with the capacity of 1.5 times that of Dublin Port (DP1.5 Project) so that it can be brought through the planning process and construction started by about 2033 should that become necessary.
6. The projects to provide additional capacity in other ports and the DP1.5 Project can only be realised with state support – none of the projects and none of the port companies (including DPC) are capable of raising the project finance that would be required.

The issues raised by the Post 2040 Dialogue papers and submissions received through the public consultation have informed the Assessment of Alternatives set out in Chapter 4 of the EIAR.

## 3.4 Consultation and the 3FM Project

Building on the consultation carried out during the process to review the Dublin Port Masterplan 2040 and the Dublin Port Post 2040 Dialogue Papers, DPC and their consultants, RPS, carried out further extensive consultation on the 3FM Project in the course of developing the current proposal.

### 3.4.1 Pre-application Consultation Meetings with An Bord Pleanála

Eight pre-application meetings took place with An Bord Pleanála (the Board) between 13<sup>th</sup> July 2021 and 25<sup>th</sup> March 2024. All the meetings took place virtually.

Representatives from the Board also undertook a field visit to the site of the 3FM Project during the pre-application consultation phase.

The first meeting with the Board took place on 13<sup>th</sup> July 2021. The purpose of the meeting was to facilitate the Board obtaining information from DPC on the proposed project to determine if the development is strategic infrastructure. DPC submitted details of the 3FM Project to the Board including a description of the nature and scale of the project and DPC's assessment of how the 3FM Project constitutes SID as defined in the Planning and Development Act 2000, as amended (PDA 2000).

DPC was of the view that the 3FM Project falls within the scope of the relevant class of development set out in the Seventh Schedule of the Planning and Development Act, 2000, as amended, on a number of specific grounds which include:

- *The site will make provision for an intermodal transshipment facility which will exceed five hectares in size;*
- *It will involve the construction of one or more quays exceeding 100m in length; and*
- *It will enable a vessel of over 1,350 tonnes to enter within it.*

DPC provided updates on progress at the subsequent pre-application meetings in relation to environmental baseline surveys and studies and how the findings were driving the evolution of the project design process; and the manner in which the proposed 3FM Project had gone through further iterations of design evolution from the original proposal through consultations, engagement, feedback and relevant assessments and studies.

In total, eight meetings were held between the Board and the prospective applicant (DPC) and a further two meetings held between the Board and two other bodies on the following dates:

- 13<sup>th</sup> July 2021 – Prospective applicant
- 21<sup>st</sup> October 2021 – Prospective applicant
- 22<sup>nd</sup> February 2022 – Prospective applicant
- 23<sup>rd</sup> June 2022– Prospective applicant
- 22<sup>nd</sup> July 2022 – Dublin City Council
- 15<sup>th</sup> September 2022 – Iarnród Éireann (Irish Rail)
- 3<sup>rd</sup> November 2022 – Prospective applicant
- 26<sup>th</sup> April 2023– Prospective applicant
- 19<sup>th</sup> December 2023 – Prospective applicant
- 25<sup>th</sup> March 2024 – Prospective applicant

After the eighth meeting took place between the Board and DPC, the Board considered that it had sufficient information to make a determination on whether the 3FM Project constituted SID. DPC thereby formally requested to close the pre-application consultation phase with the Board.

The Board reverted with its determination confirming that the 3FM Project constitutes SID.

The Board's determination and Inspector's Report is presented in Appendix 3-1.

### **3.4.2 Pre-application Consultation Meetings with Dublin City Council Planning and Property Development Section**

Nine pre-application consultation meetings took place with Dublin City Council (DCC) Planning and Property Development Section, the Planning Authority, between 15<sup>th</sup> April 2021 and 21<sup>st</sup> March 2024.

A summary of each of the meetings is presented in Table 3.1. The initial consultations undertaken in April 2021 were based on a discussion of the 3FM Project Preliminary General Arrangement Drawing (Rev 0) of January 2021. Subsequent meetings were focussed on updated General Arrangement drawings and outline design as the 3FM Project evolved through taking on board feedback from the consultation process.

**Table 3.1 Consultation Meetings with Dublin City Council Planning and Property Development Section**

<b>Key Comments made by Dublin City Council Planning and Property Development Section</b>
<p><b>First Pre-Application Meeting 15th April 2021 (DCC Planning and Property Development Section and DCC Senior Management)</b></p> <p>DCC expressed positive interest in the Active Travel Corridors proposed throughout the Poolbeg Peninsula:</p> <ul style="list-style-type: none"> <li>• DCC expressed a preference for the Active Travel Corridors to include separation between cyclists and pedestrians</li> <li>• Particular interest was expressed in Active Travel Corridors to and from Pigeon House Harbour</li> <li>• Particular interest was also expressed in Active Travel Corridors to and from the Great South Wall with a view to enhancing a soft edge along the southern perimeter of the Poolbeg Peninsula.</li> </ul> <p>DCC's view on the proposed Amenity Road connecting Poolbeg Strategic Development Zone (SDZ) and the Great South Wall:</p> <ul style="list-style-type: none"> <li>• The principle of creating an Amenity Road was positive but it would be problematic if the route needed to encroach on the Brent Geese Landing Strip which formed part of the South Dublin Bay and Tolka Estuary SPA.</li> <li>• Space was also required to accommodate a proposed District Heating System supplied from heat generated by the Encyclis Waste to Energy Facility.</li> </ul> <p>DCC's view on the alignment of the proposed Luas:</p> <ul style="list-style-type: none"> <li>• DCC would like to see consideration of an alternative to a terminus at the Poolbeg SDZ which would enable the Luas line to be extended to serve the Sandymount area.</li> </ul> <p>DCC expressed a need for detailed discussions between DCC and DPC on the proposed requirements for new road layouts, realignments of existing roads and land take requirements. DCC nevertheless confirmed that indicative routes presented would suffice for the next Dublin City Development Plan.</p> <p>Pigeon House Harbour Redevelopment (including the decommissioned Poolbeg power station):</p> <ul style="list-style-type: none"> <li>• DCC confirmed that they had received expressions of interest with regard to the redevelopment of Pigeon House Harbour.</li> <li>• At least one expression of interest received by DCC included introducing an element of residential use.</li> <li>• DCC want to avoid proposed events space at this location to be boxed in by containers and HGVs</li> <li>• DCC expressed a preference that the proposed access route to Area N should avoid DCC lands.</li> <li>• DCC were against an option of a bridge linking Area N to Area M as it would create a significant adverse impact on the seascape from Pigeon House Harbour</li> </ul> <p>DPC recommended that the potential impact of Flood Risk be addressed at an early stage in the process. An update of Dublin City's Strategic Flood Risk Assessment was currently being initiated.</p> <p>DPC confirmed that it was their intention to update the Preliminary 3FM Project GA Drawing based on the findings of the current round of consultations.</p>
<p><b>Second Pre-Application Meeting 29<sup>th</sup> April 2021 (DCC Planning and Property Development Section)</b></p> <p>In the following description, the nomenclature refers to that used in the Dublin Port Masterplan 2040 (refer to Figure 1.1)</p> <p>Land use of Area K and Area N:</p> <ul style="list-style-type: none"> <li>• DPC confirmed that Area K would be used for a Roll-On Roll-Off (Ro-Ro) Terminal, mostly for Freight Trailers. This would ameliorate noise issues associated with the current MTL Container Terminal.</li> <li>• DPC confirmed that Area N would be used for a new Lift-On Lift-Off (Lo-Lo) Container Terminal. This new site would place the noisiest activity of the Port furthest from residential properties.</li> <li>• DPC confirmed the need for the container terminal. There are currently only five container terminals operational in Ireland, three at Dublin, one at Cork and one at Waterford (at limited capacity).</li> </ul> <p>Land use of Area M and Area L:</p> <ul style="list-style-type: none"> <li>• DPC confirmed that Area M would be for non-bulk cargo only</li> <li>• The existing Area L was used mostly for bulk cargo</li> </ul>

Proposed new road constructed on the Foreshore between the Bridge Crossing and Poolbeg Marina:

- DCC would like to see the minimum amount of infilling of the River Liffey at this location

Land Use at Area O:

- DCC expressed a need to test the future use of Area O against competing needs.
- The preferred location for a future Electrical Substation to serve the Poolbeg West SDZ site and the Hot Water Tanks to support the proposed District Heating System was to be investigated.

Pigeon House Harbour:

- DCC were keen that the seascape view from Pigeon House Harbour is maximised.
- The site of the existing disused Sludge Jetty may be a good location for a public viewing platform
- Expressions of interest in developing Pigeon House Harbour were primarily for events, concerts, and film making. Residential use was being discouraged.

Active Travel Paths:

- Active Travel Paths to Pigeon House Harbour and the Great South Wall were of key importance.
- The alignment of the proposed Amenity Road should be reviewed in light of the Brent Geese Landing Strip being designated a SPA.
- The Active Travel Paths should be consistent with the principle of creating a soft edge to the southern shoreline of the Poolbeg Peninsula.
- Sufficient width was required to separate cyclists from pedestrians
- The potential conflict of the South Port Access Route (SPAR) and public access needed to be assessed.

Port Heritage:

- The 3FM Project should consider the potential for Heritage Gain with respect to Port Heritage and in particular the Great South Wall which is very popular for walking.

Comments on the Preliminary General Arrangement Drawing:

- Clarity is required to show the marine areas to be subject to capital dredging only, not to be confused with infill works
- Further use of 3D visualisation would be helpful.
- The following Active Travel Path layers should be identified
  - Existing active travel paths (available from DCC)
  - Proposed active travel paths
  - Identified Gaps
- Visualisation of traffic movements would also be beneficial

### **Third Pre-Application Meeting 22<sup>nd</sup> October 2021 (DCC Planning and Property Development Section)**

Southern Port Access Route (SPAR):

- DCC sought clarity on the routes that HGVs would take to/from the SPAR and Area N & Area O
- Further detail was required on reconciling the movement of HGVs and people within the adjoining Active Travel Corridors
- The environmental impact of infilling part of the River Liffey at this location would need to be subject to robust assessment

Community Gain:

- DCC would like to see how the three proposed Amenity Areas would be linked with a particular focus on
  - Accessibility
  - Connectivity
  - Linkage to the Liffey-Tolka Project
  - Soft infrastructure

Change of Port Function at Area K:

- DCC confirmed that the proposed change of function from Lo-Lo to Ro-Ro was likely to be acceptable, subject to environmental assessment

Land use of Buffer Zone between Area K and Poolbeg West SDZ:

- DCC requested further clarity on the land use proposed within the buffer zone between Area K and Poolbeg West SDZ

Land use of Area M / Turning Circle:

- DCC welcomed the removal of Area M as a multi-purpose berth from the Project and its alternative use as a Turning Circle for vessels.

Pigeon House Harbour:

- DCC expressed the importance of the heritage value of this site.
- It was noted that DPC now wished for the proposed access road to Area N to be constructed on DCC owned land. This element of the project would need to be discussed in detail between DPC and DCC.
- The proposed roundabout at the entrance to Pigeon House Harbour and Area N would also be subject to further detailed analysis and discussion.

Proposed new Container Terminal at Area N and Area O:

- DCC considered the foreshore at Area N to be ecologically sensitive and would need to be subject to robust environmental assessment.
- The key environmental factors to be considered at Area O were
  - Noise from containers
  - Landscape and Visual
  - Alternative Uses against completing needs (why can the Dublin Inland Port not be considered as an Alternative?)
- Connectivity between Area N and Area O required further clarity and how the two sites will be effectively managed including the flow of HGVs and the use of Shelley Banks Road.

Interaction with other Utilities:

- DCC welcomed the discussions which were ongoing with the other stakeholders with interests within the Poolbeg peninsula.

#### **Fourth Pre-Application Meeting 30<sup>th</sup> May 2022 (DCC Planning and Property Development Section)**

Traffic volumes:

- DCC sought clarity on the proposed traffic volumes, peaks and usage of the south port area.

Coastguard Cottages:

- DCC sought clarity on whether the residents at Coastguard Cottages had engaged.
- Noted that a robust baseline would be required on all aspects but particularly noise and landscape.
- DCC sought clarity on what mitigations were being proposed with regard to noise and road surface.

Pigeon House Road:

- DCC sought clarity on the proposed use of Pigeon House Road and its removal from the project. DCC were not satisfied that the heritage and COMAH rationale were robust enough to rule the route out of the project. Further narrative was required.

Pigeon House Harbour:

- DCC expressed the importance of the heritage value of this site.
- The proposed roundabout at the entrance to Pigeon House Harbour and Area N would also be subject to further detailed analysis and discussion. DCC sought to ensure that DPC had examined all options as to the access arrangements and that heritage had been considered. Noted that the roundabout at Sean Moore was being removed due to compatibility with active travel. Noted whether Pigeon House Road, Shelley Banks Road could be used as a 'roundabout'. DCC advised that heritage be addressed, noted the strength of the heritage team appointed.
- It was noted that DPC will need to discuss the land take in detail between DPC and DCC

Land use of Buffer Zone between Area K and Poolbeg West SDZ:

- DCC requested further clarity on the land use proposed within the buffer zone between Area K and Poolbeg West SDZ. Suggested some narrative be included in the proposal on how this area would be developed.

Land use of Area M / Turning Circle:

- DCC noted potential use of Area M and wind energy industry.
- DCC noted that wash from the turning circle will need to be addressed in the project.

Proposed new Container Terminal at Area N and Area O:

- DCC sought to ensure that DPC had examined all options as to the circulation, access arrangements and connectivity between Area N and Area O, and how the two sites will be effectively managed including the flow of HGVs and the use of Shelley Banks Road.
- Sought some clarity on whether traffic can avoid Port Park and the glass bottle factory site.
- DCC suggested a balanced approach be taken to the movement of HGV traffic across the Poolbeg Peninsula and the possible rethinking of the use of Pigeon House Road, again balancing the needs of traffic and heritage restrictions

Interaction with other Utilities:

- DCC noted discussions which were ongoing with the other stakeholders with interests within the utility area.

Community Gain:

- DCC expressed no clear view on current CG proposals.
- DCC were of the opinion that active travel measures along the 'amenity' function sections would have scope to increase and decrease between 3.5 and 5m. The 'commuter' function section of the route would need to be segregated to accommodate pedestrian and cycle movements.

Rail:

- Noted that Iarnród Éireann (Irish Rail) had made a submission with regard to rail access to the port.

**Fifth Pre-Application Meeting 29<sup>th</sup> September 2022 (DCC Planning and Property Development Section)**

Area N:

- DCC sought clarity on the proposed impact on the South Wall and opportunities for public awareness.

Area O:

- DCC noted the use of Area O and that stacks would be limited to three containers in height.
- Acknowledged that this area would not be visible but sought detail of noise impacts on the nature reserve.
- Sought clarity on intensity of use, access/egress and circulation.

Area K:

- DCC noted the proposed six container stack (c.18) requirements in Area K to facilitate ConRo. Comparing this height with that proposed in the SDZ and what might come forward on the buffer zone between Area K and the IGB site, they felt, in principle, subject to assessment, there was no issue.

Land use of Buffer Zone between Area K and Poolbeg West SDZ:

- DCC requested further clarity on the land use proposed within the buffer zone between Area K and Poolbeg West SDZ.
- DCC suggested studies be undertaken to ensure that the buffer can support a viable development and that end users cope with an interface with the SDZ and the Port particularly with respect to noise impacts.

Road Network:

- DCC noted revised road layout.
- DCC requested a landownership map be prepared showing those roads which are:
  - Owned By DPC but taken in charge by DCC and used as a public road.
  - Owned by DPC and maintained by DPC and used as a public road.
  - Owned by DPC and maintained by DPC and not used as a public road.

- DCC noted that procedures requiring extinguishment of Public Rights of Way or Road Closures may be required on foot of final proposals.
- DCC urged that proposals do not result in Sites Left Over After Planning (SLOAP) i.e. unusable residual areas.
- DCC asked that all Heritage Assets be mapped.

Pigeon House Harbour:

- Notwithstanding the proposed reduction in the roundabout junction DCC advised they do not find a roundabout junction at this location aesthetically pleasing in the context of Pigeon House Harbour. They advised that the entrance junction and access road to Area N will need further detailed design analysis and discussion with respect to its impact on Pigeon House Harbour.
- DCC advised that any land take resulting from the required access to Area N will need to ensure that proposals which may come forward at Pigeon House Harbour are not compromised.
- DCC advised that further detail is required with regard to the proposed dedicated entrance to Pigeon House Harbour.

SPAR:

- DCC sought clarification on the extent of the SPAR revetment. Noted the ecological sensitivities of this area. Noted the proposed revetment and queried whether a more natural revetment could be considered to mimic what currently exists.
- With regard to the LUAS and width of reservation, with no future plans in place, DCC will seek to futureproof alignment.

Land use of Area M:

- DCC noted that the 3FM Project will no longer include Area M in the provision of Community Gain.
- DCC noted and acknowledged that the site was now intended to facilitate the proposed Codling Wind Park project.

Coastguard Cottages:

- Advised that cumulative impacts of a double road will need to be considered as part of the application.

Community Gain:

- DCC noted that community gain proposals were not finalised and that details would be provided prior to submission of the planning application.
- Whilst acknowledging the heavy industrial environment of the existing area and the proposed development, DCC advised that they have a latent fear the project may result in a series of compounds and perhaps not accord with port objectives such as the softening of port edges and port reintegration with the city. DCC advised that a greening/softening strategy should be considered which includes proposals that incorporate the active travel measures, boundary treatments, measures that provide relief within this environment, provides linkages between proposed open spaces and avoids SLOAP.
- DCC noted that active travel is generally a requirement however it is a gain to the city which is difficult to monetise or measure in terms of social gain.

Consultations:

- DCC advised that the NTA had indicated to DCC that they would like to engage with DPC with regard to the proposed design for the SPAR bridge.

**Sixth Pre-Application Meeting 4<sup>th</sup> May 2023 (DCC Planning and Property Development Section)**

Project overview:

- DPC provided an update on progress in relation to the project design process; and how the proposed 3FM Project had gone through further iterations of design evolution from the original proposal through consultations, engagement, feedback and relevant assessments and studies.

Consultation:

- DCC undertook to submit a response to DPC's letter of 21<sup>st</sup> March 2023 which sought observations from DCC to further assist in the evolution of the 3FM Project design process.

### Seventh Pre-Application Meeting 21<sup>st</sup> March 2024 (DCC Planning and Property Development Section)

**Project overview:**

- DPC provided an update on further iterations of design evolution made since the second consultation process and the submission made by DCC.

**Area O**

- Area O is to become a Ro-Ro yard to store trailers before their onward journey. DCC believed this amendment was a positive step towards reducing noise and traffic movements. DCC advised that measures to ensure traffic movements would be diverted away from the residential areas at night should be highlighted together with change to tractor tech demonstrating reduction in noise. It was noted that this area would provide compounds for different users to include Codling Wing Park, ESB and Uisce Éireann.

**Area L**

- Area L is to become a Lo-Lo transit container storage yard. Two of the existing tenants will relocate. Stacks will be 6 containers high. DCC sought some information on existing users.

**Port Park**

- DCC noted the changes and the move to facilitate the proposed DCC District Heating Scheme closer to the Waste to Energy Plant. DCC sought clarification on the coastal path and active travel details. DCC also sought clarity on DPC ownership at interface to the Glass Bottle Site and Sean Moore Park.

**Other points arising from the meeting**

- Heritage – DCC noted the measures and queried was the 1% scheme being applied.
- DCC noted that a DCC bridge application adjacent to Tom Clarke Bridge would likely precede the 3FM Project.
- DCC noted that provision for the Eastern By-Pass was no longer required however amendments to Planning Scheme would not be undertaken until the SPAR was resolved.
- DCC confirmed they were generally supportive of port development in accordance with prevailing policy.

### 3.4.3 Pre-application Consultation Meetings with Prescribed Bodies and Key Stakeholders (2021)

The following virtual meetings took place with the following prescribed bodies and key stakeholders, presented in Table 3.2. The consultations were based on a discussion of the 3FM Project Preliminary General Arrangement Drawing (March 2021) as shown in Figure 3.1. This consultation process took place at a time when public health restrictions concerning COVID-19 were in place.

Table 3.2 Consultation Meetings with Statutory Bodies and key stakeholders

Prescribed Body/ Key Stakeholder	Date of Meeting
Birdwatch Ireland (BWI)	24 <sup>th</sup> March 2021
Inland Fisheries Ireland (IFI)	6 <sup>th</sup> April 2021
Encyclis (Formerly Covanta)	7 <sup>th</sup> April 2021
Department of Transport, Tourism and Sport (DTAS)	8 <sup>th</sup> April 2021
Uisce Éireann	8 <sup>th</sup> April 2021
National Oil Reserves Agency (NORA)	12 <sup>th</sup> April 2021

Environmental Protection Agency (EPA)	13 <sup>th</sup> April 2021
Transport Infrastructure Ireland (TII)	14 <sup>th</sup> April 2021
Electricity Supply Board (ESB)	15 <sup>th</sup> April 2021
Department of Housing, Local Government and Heritage (DHLGH)	20 <sup>th</sup> April 2021
Fáilte Ireland	20 <sup>th</sup> April 2021
National Transport Authority (NTA)	26 <sup>th</sup> April 2021
Marine Institute	29 <sup>th</sup> April 2021
Ronan Group Real Estate (RGRE) and Lioncor	29 <sup>th</sup> April 2021
DHLGH National Parks and Wildlife Service (NPWS)	2 <sup>nd</sup> June 2021
DHLGH Built Heritage and Underwater Archaeology Unit, National Monuments Service (NMS)	30 <sup>th</sup> June 2021
Docklands Business Forum	15 <sup>th</sup> July 2021
Office of Public Works (OPW)	1 <sup>st</sup> September 2021

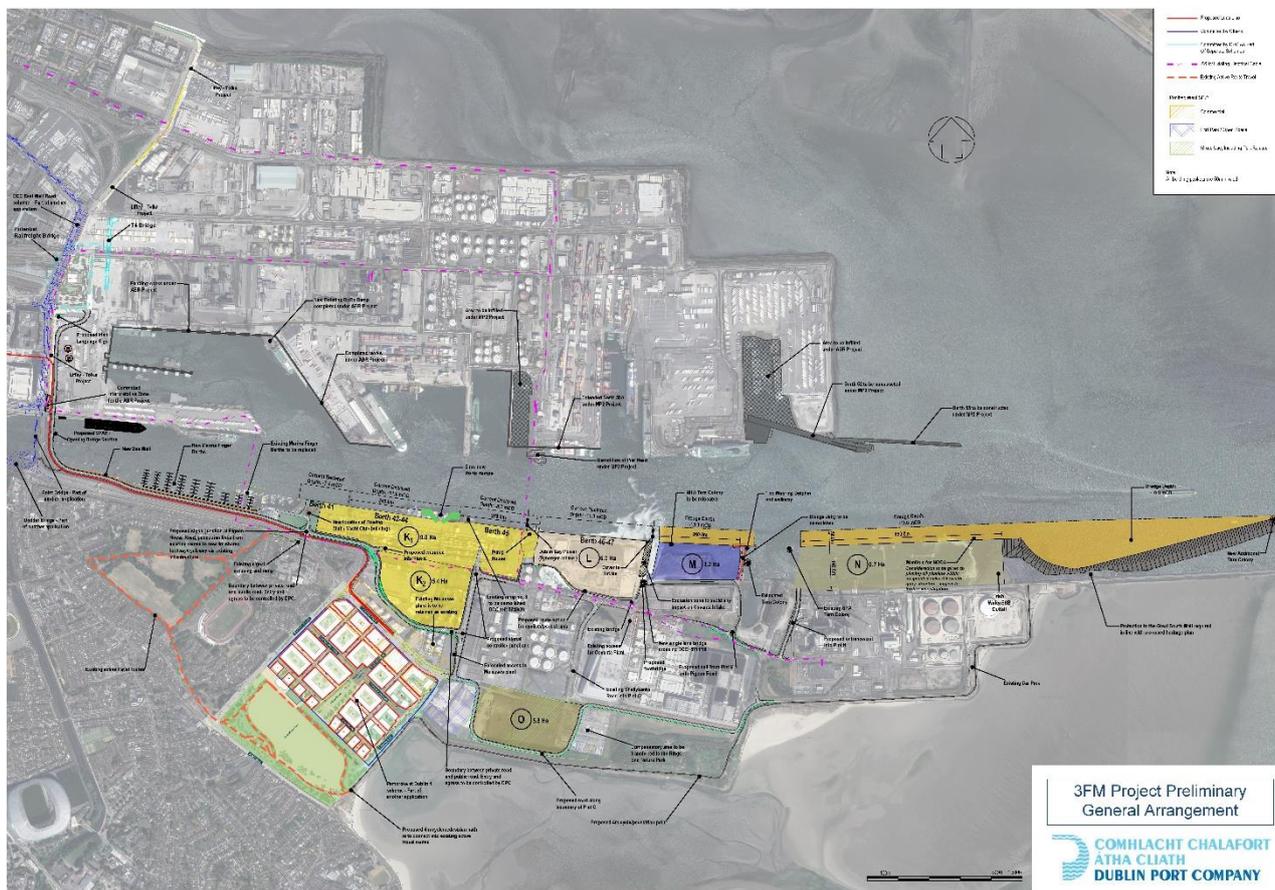


Figure 3.1 3FM Project Preliminary General Arrangement (March 2021)

Note: this Preliminary General Arrangement is assessed as Option 1 in Chapter 4, Assessment of Alternatives.

The issues raised during the consultation meetings which have fed into the informal or non-statutory scoping of the EIAR and NIS and evolution of the 3FM Project are set out in Table 3.3.

**Table 3.3 Consultation Meetings with Statutory Bodies and key stakeholders**

<b>Key Comments made Prescribed Body / Key Stakeholder</b>
<p><b>Birdwatch Ireland (BWI) 24<sup>th</sup> March 2021</b></p> <p>CDL Tern Colony (NHA) – most important for Arctic Terns, BWI said an Appropriate Assessment would be required as part of the planning application. Advice from NPWS would be essential on the legal approach to the work.</p> <p>ESB Tern Colony (SPA) - concern that site is too close to Area N (wharf in front of ESB Generating station) due to potential disturbance, both visual and noise. It was noted that following partial collapse of the ESB 'dolphin' structure, it appears that ESB re-constructed it smaller than its original size by circa 50%.</p> <p>Proposed GSW Tern colony – the new structure would possibly be constructed so that it would rise and fall with the tide on guide piles. A modular approach would be taken to increase its size over time. The proposed Tern colony would be located in the general vicinity of the existing temporary DPC floating pontoon. BWI expressed great interest in this approach and referred to the success of the Wilhelmshaven Tern Colony in Germany for Common Tern.</p> <p>BWI expressed an interest in incorporating hides into the design.</p> <p>It was noted that there were differences in the preferred habitat for Arctic Tern compared to Common Tern. Arctic Tern at Dalkey seem to like bare granite well above the water line.</p> <p>BWI highlighted the importance of an inter-tidal area adjacent to the ESB outfall weir (noted previously under MP2 Project)</p> <p>It was noted that the proposed Amenity Road encroaches into the Brent Geese Landing Strip which is included within the South Dublin Bay and Tolka Estuary SPA.</p>
<p><b>Inland Fisheries Ireland 6<sup>th</sup> April 2021</b></p> <p>IFI's key issue is the collapse of migratory salmon numbers. The total number of salmon entering the Liffey catchment is now only circa 500 fish annually.</p> <p>There are a number of contributory factors to the decline including upstream weirs and dams and (potentially) climate change. Dublin Port may be a contributory factor as it acts as a pinch point in the system and has created a number of hard engineering structures in what was historically a natural river delta.</p> <p>The most critical time period is the run of salmon smolts (March – May)</p> <p>There are also important runs of sea trout and eel.</p> <p>IFI expressed concern that the proposed creation of deep-water berthing pockets to -13.0m CD may alter the salmon run towards the deeper water where vessels will be at berth.</p> <p>There are a number of resident species within the Liffey estuary. Numbers may be artificially elevated locally as a result of the warmer water from cooling water discharges.</p> <p>IFI do not wish to see a rise in alien species resulting from the discharge of ballast water.</p> <p>Area N was of most concern to IFI due to its size. An open-piled structure would probably be preferable but IFI would like to see a thorough analysis of habitat gain/loss and an understanding of the value of each habitat lost/gained.</p> <p>IFI wishes to see sustainability at the centre of the 3FM Project with soft engineering aspects integrated into the design – maximizing space for nature. The use of a Natural Capital approach should be investigated.</p> <p>The use of computational coastal modelling would be required as part of the assessment.</p>

IFI queried whether Dublin Port would in fact stop further development on completion of the Masterplan 2040. DPC explained the Post 2040 Dialogue papers and that any further significant infrastructure development at Dublin Port would be very difficult in light of more sustainable alternatives.

**Encyclis (formerly Covanta) 7<sup>th</sup> April 2021**

Summary of Encyclis operations

- Encyclis currently leases the site of its Waste to Energy Facility from DCC, which owns the land and Shelley Banks Road.
- 121 trucks arrive at the Encyclis plant each day
- All large transfer trailers arrive via the Dublin Tunnel
- Normal refuse vehicles can also arrive from the south
- There are plans to increase capacity of the plant but this will not result in an increase in the number of trucks arriving to the plant
- Bottom ash (125,000 tonnes/year) and fly ash (30,000 tonnes/year) are exported via Dublin Port at Berths 46 & 47. There are future plans to treat the ash in Ireland, whereby the ash will be transferred by road using the empty transfer trailers.
- The Encyclis Facility includes a facility situated to the west of Shelley Banks Road which comprises maintenance buildings and parking yards. Staff regularly cross Shelley Banks Road to the main site.
- The main site carpark lies to the south of the Encyclis building. Access is via Shelley Banks Road. Staff also cycle to work.
- The western entrance at Pigeon House Road has barriers which were used during the construction phase but are no longer operational.
- There are plans for a District Heating System requiring pipework from the main Encyclis Building to an area in the vicinity of Area O where it is proposed to construct a Thermal Storage facility and water treatment plant comprising a series of large tanks containing hot water. Further pipework will be required to connect this site with the recipients of the scheme.

A landscaped berm to the north-west of the plant hosts a weather station but serves no other purpose. The potential removal of any of this material for future road widening purposes would need to be tested for contaminants.

The cooling water intake and outlet are essential to the Encyclis plant operations. The proposed capital dredging required to form a deep-water berthing pocket at Area M would need to be carefully managed to ensure the quality of the water supply to the plant. Precautions would need to be agreed to ensure no damage to the over-ground pipework.

The safety of site personnel getting to and from work is of paramount importance, including crossing Shelley Banks Road from the Maintenance yards.

There was concern expressed with the current practice of HGVs parking up either side of Pigeon House Road waiting to enter the MTL Container Terminal and restricting the flow of traffic to the Encyclis plant.

There was no space available at the southern end of the Encyclis site to accommodate a potential Amenity Road.

There were no Encyclis utilities within the areas to the north of the Encyclis plant where potential land take is required to facilitate local road widening, provide sight lines and right turn only lanes.

**Department of Transport, Tourism and Sport (DTTAS) 8<sup>th</sup> April 2021**

It was agreed that the purpose of the meeting was to inform DTTAS of the 3FM Project but that the meeting did not form part of the statutory process. It was noted that it was not appropriate for DTTAS to express a view at this stage in the process.

DTTAS welcomed DPC's strategic thinking and forward planning but noted that the involvement of multiple parties would be needed from a roads and rail perspective including TII, NTA and DCC.

**Uisce Éireann 8<sup>th</sup> April 2021**

Summary of Ringsend Wastewater Treatment plant (WwTP) operations

- Ringsend WwTP is currently being upgraded to increase capacity to a population equivalent of 2.5 million.
- The Capacity Upgrade Contract (CUC) began in 2014 and is scheduled to be completed by 2025/26.
- Further to completion of these works, Ringsend WwTP will have reached its maximum capacity.

- The main outfall channel for treated wastewater is shared with ESB's cooling water discharge from the ESB Generating Station. The maximum flow from the WwTP is 11.4 cumec. This is close to the maximum flow by which the hydraulic gradient allows the discharge from the WwTP to the outfall channel under gravity.

There is a storm overflow discharge located to the northeast of the existing storm water tanks.

The construction of Area N would need to ensure that there would be no significant change to:

- The existing hydraulic gradient
- The dispersal of the effluent streams within the inner Liffey channel and Dublin Bay.

The ongoing construction works at Ringsend WwTP would not conflict with the 3FM Project which is tentatively scheduled to commence construction in 2026 -2027.

Uisce Éireann noted that their plant served the majority of Dublin and were dependent on power supplies from ESB. It was therefore essential that any proposed DPC works did not disrupt the power supply during construction.

#### **National Oil Reserves Agency (NORA) 12<sup>th</sup> April 2021**

NORA is responsible for ensuring that Ireland meets its obligations under EU legislation and International Energy Agency rules to maintain a minimum of 90 days stock of oil for use in the event of a shortage of supplies.

NORA Facilitates on the Poolbeg peninsula:

- NORA Ringsend Facility located to the west of Shelley Banks Road comprising nine tanks all containing winter grade diesel. To transfer the fuel between the tanks and the quays for import/export, a manifold is located underground within Area L under a protective steel sheet. The diesel has not been replenished since 2011 but will be changed soon to refresh the product.
- NORA Poolbeg Facility adjacent to the ESB Generating Station comprising seven tanks (group of four tanks containing 82,000 tonnes winter grade diesel, larger standalone tank containing 32,000 tonnes Jet A1 fuel, group of three tanks with the two western tanks being used by ESB as a diesel reserve and the eastern tank filled with water for fire-fighting purposes. The tanks are supplied via the Poolbeg Oil Jetty via overland pipelines). Other facilities include a control centre and loading area to transfer fuel to oil trucks for transport by road. Five medium range (MR) oil tankers were used to transfer fuel to the tanks between 2019 and 2021.
- Both facilities must be able to transfer their product at any time in case of a national emergency. This includes a loss of gas to the ESB Generating Station which would switch to oil and necessitate the replenishment of the two supporting oil tanks.

The 3FM Project will require the following works which will impact on the NORA facility adjacent to the ESB Generating Station

- Poolbeg Jetty will be demolished as part of the 3FM Project. A new manifold and below ground pipeline route will therefore be required at Area N. The route will be dictated by the position of the ship to shore cranes for the proposed Lo-Lo Terminal and to allow a Medium Range Oil Tanker to safely berth and discharge oil at mid-ship.
- The phasing of the construction works is of key importance to ensure NORA's capability of transferring oil during an emergency at very short notice.

At this early stage in the project, no 'show stoppers' were identified. DPC and NORA agreed to work in close collaboration going forward.

#### **Environmental Protection Agency (EPA) 13<sup>th</sup> April 2021**

Existing Air Quality Monitoring Stations:

- North Port – relatively new continuous air quality monitoring station, DPC and Dublin City Council initiative with support from the EPA.
- South Port – relatively new EPA continuous air quality monitoring station at Ringsend Civic Amenity Centre.

DPC air quality monitoring programme. The 2020 Air Quality Monitoring Report is available. The 2021 programme has extended the number of air quality monitoring sites within the Poolbeg Peninsula.

The key air quality parameters of concern are:

- Nitrogen Dioxide – mainly sourced from emissions from vehicle engines, ships and operational plant. Its impact can be accurately modelled by taking account of the number of HGVs, dwell time and details of the power source.
- Sulphur Dioxide – mainly sourced from ship emissions and the fuel type used
- PM10 – mainly fugitive emissions from bulk cargo

Legislation and Policy Updates:

- WHO guidelines and EU Limit Values set by the Air Quality Clean Air For Europe Directive (2008/50/EC) known as the CAFE Directive are currently being reviewed. The review is scheduled to be completed by 2023 and likely to set lower CAFE limit values.
- The National Clean Air Strategy will be launched in 2021 to provide the strategic policy framework necessary to identify and promote the integrated measures across government policy that are required to reduce air pollution and promote cleaner air while delivering on wider national objectives.
- The Local Authorities are currently developing an Air Quality Action Plan to mitigate against future Nitrogen Dioxide exceedances.

Research:

- The EPA has recently launched an Air Quality Source Apportionment Research Project focussed on Dublin Port led by Prof. John Wenger. This will be a three year project with interim results made available. DPC will work in collaboration with this research group.
- The EPA is launching a 'Life Emerald' air quality forecasting system in April 2021.
- A Clean Air Project will be initiated in the autumn 2021 across Dublin based on citizen science whereby 1,200 Nitrogen Dioxide diffusion tubes will be made available to the public to undertake monitoring within their local area.

The objective of the 3FM Project is to grow capacity within Dublin Port and therefore represents an intensification of an existing activity. Mitigation is therefore likely to be required:

- Consideration of the provision of shore-side electricity for shipping whilst at berth
- Electrification of Port Operations plant
- Consideration of use of alternative fuel sources
- Consideration of future bulk cargo handling facilities

Detailed modelling of the impact of the 3FM Project on air quality will be required.

**Transport Infrastructure Ireland (TII) 14<sup>th</sup> April 2021**

TII expressed concern regarding the capacity of the Dublin Tunnel to accommodate the proposed growth in port traffic.

TII expressed a view on the proposed Luas route set out in the preliminary 3FM Project General Arrangement drawing:

- TII were in agreement with the route from the Point to the crossing of the River Liffey. However TII were examining alternative routes to the Poolbeg SDZ via Irishtown.
- TII were also considering alternative public transport options to the Poolbeg SDZ because the residential density is now less than originally envisaged. The Luas concept may be replaced by a bus/rubber wheeled solution using a proposed bridge crossing of the River Dodder.

TII were also considering alternative public transport options to the Poolbeg SDZ because the residential density is now less than originally envisaged. The Luas concept may be replaced by a bus / rubber wheeled solution TII expressed a view that the South Port Access Route (SPAR) may be better suited to be a public road.

DPC confirmed that the SPAR would be designed to enable its operation as a public road network.

TII confirmed that they had initiated a high level review of the need for an Eastern Bypass. The review was expected to be completed by June 2021. Depending on the findings of the review, the concept of an Eastern Bypass would either be dropped or adopted into the next round of policy documents. It was confirmed that an Eastern Bypass would not be advanced within the lifespan of the National Development Plan to 2040.

### Electricity Supply Board (ESB) 15<sup>th</sup> April 2021

ESB highlighted the strategic importance of the Poolbeg site for both power generation and power supply networks.

- There are two stations on the site:
  - A thermal station which is no longer operational
  - A combined cycle gas station containing units CG14, CG15 and ST16, which is located towards the eastern end of the site.
  - Cooling water is taken from the Liffey and discharged with the Wastewater from Ringsend Waste Water Treatment Plant via an open channel and discharge weir.
- There are five No 220kV cables connecting the site to the electricity network
- New infrastructure is proposed to support renewable energy, notably offshore wind, which will need to be accommodated within the existing footprint of the site.

The interaction between the thermal plume discharge and the cooling water intake is of key importance. It is also important to make provision for a future increase in capacity of the intake and outtake system. DPC undertook to address these issues in the design of the wharf at Area N. It was agreed that Thermal Plume Modelling would be undertaken to assess the impact of Area N on the existing dispersion regime.

The proposed DPC access road to Area N, shown on ESB lands, overlaps with an ESB planning application to Dublin City Council for Flexible Generation and Battery Storage (Planning Ref 3647/20). DPC undertook to review alternative access routes to Area N.

It was noted that DPC did not intend to proceed with demolition works at the North Wall Quay Extension in the short to medium term. The existing 220 kV cable crossing of the Liffey at this location would therefore no longer be impacted.

It was noted that DPC had commissioned a COMAH Report which ruled out the possibility of reopening, to the public, a length of the Great South Wall immediately to the north of the ESB Generating Station.

It was agreed that DPC and ESB would work in collaboration to resolve potential pinch points within the 3FM Project.

### Department of Housing, Local Government and Heritage (DHLGH) 20<sup>th</sup> April 2021

DHLGH was pleased to see DPC's approach to early strategic planning for a project of this scale.

DHLGH highlighted the importance of National Port Capacity and that the 3FM Project should be considered in the next revision of the National Planning Framework.

DHLGH noted that Port-City integration should be an essential component of proposed developments by DPC.

DHLGH was currently working with the OPW on a Coastal Change Project which would be of relevance to DPC.

DHLGH highlighted two key Frameworks:

- National Planning Framework
- National Marine Planning Framework

New legislation (what is now the Marine Area Planning Act 2021) was expected to be published Summer 2021 which would pull together terrestrial and marine elements of a project under one planning umbrella led by An Bord Pleanála.

DHLGH now incorporated National Parks & Wildlife Service. It was intended to undertake a review of Imperative Reasons of Public Interest Cases under the Habitats Directive to simplify the process, where possible.

DHLGH was pleased to see that DPC had proposed delineations whereby amenity functions would be focussed on the southern portion of the Poolbeg Peninsula.

DHLGH noted that when the 3FM Project became further advanced, DHLGH would not be able to be involved in the process under Section 30 of the Planning Act. However this did not apply to the Heritage Division including NPWS.

DHLGH recommended that a separate consultation meeting be arranged with the Heritage Division.

**Fáilte Ireland 20<sup>th</sup> April 2021**

Fáilte Ireland were keen that linkages be formed between the 3FM Project and the following initiatives:

- Docklands Destination Plan
- Dublin Coastal Trail

Fáilte Ireland expressed an interest in a potential visitors experience at Pigeon House Harbour.

Fáilte Ireland were pleased at the approach taken by DPC with regard to local and tourist amenity and accommodating good access.

The approach of separating HGVs from private cars, as much as possible, was considered to be very positive.

Fáilte Ireland offered assistance to DPC on how to pitch proposed Industrial Heritage Attractions, with the customer in mind.

Fáilte Ireland confirmed they held a shared interest with DPC in expanding the visitor experience of Dublin and were keen to work in collaboration.

**National Transport Authority (NTA) 26<sup>th</sup> April 2021**

NTA intend to issue a Draft Review of their Transport Strategy for the Greater Dublin Area for Public Consultation in July 2021. The expected timeline for delivery of the Final Strategy is Q1 2022.

The NTA's Transport Strategy for the Greater Dublin Area will address the following issues which have the potential to interact with DPC's proposals for the 3FM Project.

- The need for a Luas crossing of the River Liffey, based on projected demand
- The long-term need for an Eastern Bypass

NTA welcomed DPC's initiative for Active Travel Corridors within the proposals for the 3FM Project.

**Marine Institute 29<sup>th</sup> April 2021**

MI undertake the following baseline surveys and report the results to the EPA:

- Benthic/water quality surveys in Dublin Bay are undertaken annually. This data source should be used as part of developing a robust baseline. Dublin Bay is now classified as having 'High' status under the EU Water Framework Directive. Benthic and water quality conditions show no signs of deterioration as a result of loading and dumping of dredged material to date.

Benthic/water quality surveys in the Tolka Estuary are undertaken every three years. The results show anthropogenic impact but MI do not believe there is an association with port related operations.

MI highlighted that the following potential biological issues would need to be addressed in the EIAR and NIS:

- Impact on loss of benthic habitat/fisheries as a result of infilling
- Impact on terns, over-wintering birds, marine mammals

MI also highlighted the need to undertake detailed marine sediment chemistry analysis.

- MI acknowledged DPC's initiatives under the ABR Project which has eliminated point source discharges within Alexandra Basin West.
- MI considered the main sources of pollutants were now from the upstream Liffey catchment. This has caused a trend whereby the level of contaminants within the marine sediments increase moving upstream.

The sediment chemistry at the site of the SPAR bridge crossing, in particular, would therefore need to be investigated.

**Ronan Group Real Estate (RGRE) and Lioncor 29<sup>th</sup> April 2021**

RGRE (Ronan Group Real Estate) and Lioncor are the main developers of the Poolbeg West SDZ Irish Glass Bottle Site.

The developers have also expressed an interest in the redevelopment of Pigeon House Harbour with DCC.

RGRE and Lioncor's vision is to expand the scope of the Poolbeg West SDZ to create a new district of Dublin covering much of the southern lands of the Poolbeg Peninsula with linkages to Pigeon House Harbour.

RGRE expressed a wish to work closely with DPC but asked if DPC were in a position to offer Port owned lands (Area O) to the developers.

DPC confirmed their position that Area O was an integral part of the 3FM Project and that Area O was required to enable DPC to achieve the objectives of the Dublin Port Masterplan 2040, reviewed 2018.

**DHLGH National Parks & Wildlife Service (NPWS) 2<sup>nd</sup> June 2021**

NPWS follows a hierarchy of importance when assessing development applications, with EU designated sites as the top priority, followed by nationally designated sites.

NPWS welcomed the approach being adopted by DPC for the 3FM Project by understanding the environmental constraints, early consultation and a natural capital ethos aimed at no net loss of biodiversity.

CDL Tern Colony (NHA) – most important for Arctic Terns (circa 30 pairs). Arctic Terns do not use the ESB 'dolphin' structure or floating pontoons. The reasons for this preference are unknown but contributory factors may be the height of the dolphin and material used to create the habitat.

ESB Tern Colony (SPA) – Two concerns were expressed:

- The site may be too close to Area N due to potential disturbance.
- The stability of the existing ESB dolphin would need to be maintained.

It was however acknowledged that the artificial Tern Colony habitat created by DPC's floating pontoons has been successful for Common Tern. Predation has been an intermittent issue (Rat, Black Backed Gull and potentially Mink/Otter).

Brent Geese Landing Strip (part of South Dublin Bay and Tolka Estuary SPA). One of very few grasslands protected for use by over-wintering birds. NPWS was of the view that potential loss of habitat at this location would be very problematic.

Other bird species of concern:

- **Black Guillemot** (known to nest at Berth 46/47). Presence at Dublin Port known for past 40-50 years. A conservation plan was recommended. It was noted that artificial nest boxes have been successful used at Greenore Port.
- **Sand Martin** – use old stone walls at Pigeon House Harbour
- **Kestrel / Peregrine Falcon** - present in vicinity of Pigeon House Harbour / disused power station.

Otters – spraints found in vicinity of Area M circa 10 years ago. The rock revetment between Tom Clarke Bridge and Poolbeg Marina was also likely to be used.

Habitat at Area M – remnant plant species found from former salt marsh which was infilled circa 2000 under a foreshore licence.

**DHLGH Built Heritage and Underwater Archaeology Unit, National Monuments Service (NMS) 30<sup>th</sup> June 2021**

DHLGH Built Heritage and NMS welcomed the approach being adopted by DPC to initially prepare a Conservation Management Plan (CMP) for the entire Dublin Port Estate. The following observations were made:

- DPC had pulled together a great team for preparing the CMP.
- Both DHLGH Built Heritage and NMS would like to participate in the development of the CMP

- It was recommended that the Archaeology and Built Heritage Team within Dublin City Council should be included in the discussions.
- DHLGH Built Heritage and NMS confirmed an interest in joining the DPC Team on a field trip to the site.

DHLGH Built Heritage and NMS also welcomed DPC's ongoing initiative to integrate Dublin Port with the city through the Liffey Tolka Project and various Port Heritage Projects

The following observations were made with respect to the ABR Project:

- DHLGH Built Heritage and NMS welcomed the fact that DPC were not proceeding with the demolition of the end of the North Wall Quay Extension. This would help to offset the loss of Pier Head, due to be demolished under the MP2 Project

The following observations were made with respect to the proposed 3FM Project:

- The port heritage of the area at the confluence of the Dodder and Liffey was of significant heritage interest (historic boat building and location where ships unloaded cargo)
- The original river wall between the Tom Clarke Bridge and Poolbeg Marina was of interest.
- Pigeon House Harbour was of particular interest:
  - Maintaining the seascape / sense of arrival
  - Permeability to the River Liffey / desire lines
  - The need to work closely with other interested stakeholders, notably Dublin City Council
  - Consider the potential of relocating Poolbeg Marina to Pigeon House Harbour
  - Consider Access / Amenity / Recreation value
- The Great South Wall (GSW) was considered to be the greatest challenge:
  - Significant engineering works were likely to be required to the GSW
  - It was important to evaluate the works required against the principles established in the CMP
  - Climate Change was a key issue. DPC's ongoing work on climate change with respect to the Bull Walls was welcomed.
  - It was noted that the GSW was heavily used by the public for walks, an increase in its use has been observed during the Covid pandemic. It will be important to maintain the GSW's sense of place
  - It was noted that existing accessibility to the GSW was poor, the potential for Active Travel Corridors throughout the Poolbeg Peninsula was welcomed.

DPC confirmed that the heritage zone at the Graving Docks had commenced.

#### **Docklands Business Forum 15<sup>th</sup> July 2021**

Docklands Business Forum expressed strategic concerns regarding the presence of Dublin Port at its current location:

- Alternative opportunities for the city were not being considered (commercial and residential).
- Trade routes were changing with more direct routes to the continent for which Dublin Port was less strategically located.
- The scale of Dublin Port was too large; more effort was required to develop infrastructure at other ports such as Cork.

Docklands Business Forum questioned what evidence was available to determine the destination of HGVs/cargo arriving at Dublin Port (Destination Survey).

The following queries were made regarding the 3FM Project:

- Who would own the new bridge crossing?
- What were the travel routes of HGVs to and from the South Port?
- Some additional queries raised in relation to the Liffey/ Tolka Project and the infill of the graving docks.
- Query raised on timing of planning permission.
- Query raised on origin-destination study of HGV traffic.

The Post 2040 dialogue papers and associated consultation was discussed and Docklands Business Forum were encouraged to read the papers, to inform themselves and to issue a response.

Offer was made to visit the port but declined due to time constraints.

**Office of Public Works (OPW) 1<sup>st</sup> September 2021**

Further to DPC's presentation of the 3FM Project, OPW confirmed that they had a clear picture of DPC's objectives and plans. OPW's initial view was that the 3FM Project Preliminary General Arrangement Drawing had been well thought out.

OPW provided the following observations on data availability and climate change adaptation:

- Landside elevation data / models required for flood risk assessment.
  - High resolution data is required of both the landside and seabed.
  - Landside data is available from GSI's open topographic viewer including all LIDAR data used for the Irish Coastal Protection Studies and CFRAM studies (resolution of 1 point per square metre) collected circa 2010-2012.
  - Higher resolution data (16 points per square metre) will soon be available.
- Seabed elevation data
  - Care should be taken when using different data. OPW recommended the use of a common landside/seabed datum (OD Malin OSGM 15)
- Sources of Sea Level rise
  - Flood Maps (Fluvial & Coastal) were available via the OPW's Floodinfo.ie portal for the present day and a number of future climate change scenarios.
  - The available maps are expected to be updated in Q3/Q4 2021.
- Information from Previous Studies, notably following severe flooding events in 2002.
  - Dublin Harbour exhibits a seiche effect (resonance)
  - Sandymount seafront is vulnerable to wave overtopping.
  - There are two mechanisms of coastal flooding.
    - Still water level flooding
    - Joint occurrence of water level and waves (joint probability analysis is required)
- Climate Change Reports
  - The AR6 Report was published in August 2021 setting out the latest climate change predicted scenarios. A web portal to the information contained within the report is available (NASA Web Portal)
  - The report describes five future scenarios to consider. All have a degree of uncertainty which needs to be addressed within the design.
- Approach to addressing uncertainty:
  - Climate proof the development for approximately half of its design life.
  - Build in an Adaptation Plan (ability to heighten quays etc in the future) - monitor changes, provide feedback on when/how to implement further engineering works.
- Adaptation Plan Development
  - Build in resilience in the knowledge that you cannot prevent flooding everywhere.

Consider types of surfaces, where fuels are stored, place key electronic equipment within the first floor of buildings, use of differential levels across the site.

OPW also offered advice on other issues to consider:

- Conveyance within the River Liffey as a result of the proposed bridge crossing

Erosion risk, particularly along the southern boundary of the Poolbeg Peninsula, where stretches of the coastline comprise exposed construction and demolition waste material. Protection works should consider use of structures of low reflectivity, potential wash-out/scour and coastal squeeze.

The OPW noted that no further consultation was necessary with other divisions within OPW.



- Print advertising in National and Local Media (The Irish Times, Business Post, Sunday Times, Southside People, Northside People);
- Social Media Channels (Organic & Promoted Posts across Twitter, LinkedIn, Facebook, Instagram);
- Digital display advertising including Irishtimes.com; and
- Billboard advertising (Plate 3.1)



Plate 3.1 Billboard advertising of 3FM Project VCR

The VCR was an online interactive space where the public could learn more about the 3FM Project and have their say. Care was taken to present information in a user-friendly way to aid visualisation and understanding of the project. Key elements of the VCR are shown in the following images (Plates 3.2 to 3.3).

Plate 3.2 provides an overview of the VCR layout. Guidance provided direction as to how to travel virtually around the room and to ensure that no important information was missed out by the person in the room.



Plate 3.2 Overview of the Virtual Consultation Room (VCR) showing all the “display boards”

The contents of the VCR are set out below:

- The Rationale for the 3FM Project
- An Introduction to the 3FM Project
- Details of the Project development proposals with information on:
  - the Southern Port Access Route;

- New Ro-Ro Terminal;
  - New Lo-Lo Terminal;
  - Turning Circle;
  - Provision for Utilities;
  - Community Gain provision; and
  - Details of Environment, Heritage, and Planning impacts.
- Maps and images of the development proposals were also provided on the Virtual Consultation Room as well as some initial Computer-Generated Imagery.

The VCR also provided information on how the public could submit their views and perspectives on the 3FM Project proposals, including through the portal itself.

The VCR utilised short “Video Explainers” to encourage engagement with the material and assist visualisation of the project site. In Plate 3-3, the former CEO of DPC Eamonn O’Reilly provides an introduction to the project and outlines the purpose of the VCR and the main components of the 3FM Project. A further series of Video Explainers were also provided which provided explanations from experts in the following subject areas:

- Traffic, Transportation and the proposed Southern Port Access Route;
- Harbour Operations and Navigation;
- Details regarding main features of 3FM Project;
- Archaeological and Cultural Heritage Aspects;
- Community Gain; and
- EIA and Planning

Each of the main components of the 3FM Project were explained through a series of individual posters which when clicked on provided a detailed description and drawings of the proposed layouts.



Plate 3.3 Video Explainers, Explanation of Key elements, Download site of key documents

As well as reading the material when in the VCR, there was also a feature where documents could be downloaded onto the user's device and saved for reading or consulting at a later stage.

While the initial consultation process over November and December 2021 was limited in the capacity to hold in-person consultation events and meetings, the process did lead to a significant level of feedback and responses from consultees.

The process resulted in the following inputs:

- There were 5,179 visits the website (83% from Ireland; 67% from the Dublin area);
- There were 91 submissions received:
  - 41 detailed submissions; and
  - 50 feedback forms from the VCR
- The five most viewed sections in the room were:
  1. Map & Image Centre;
  2. Southern Port Access Route;
  3. Welcome Information;
  4. Introduction to the 3FM; and
  5. Waterside – Turning Circle.

Each organisation/member of the public who made the effort to make a submission was invited to participate on a guided tour of the 3FM Project, viewed by boat on the River Liffey.

Three Boat Tours took place with the following invited guests:

- Boat Tour No. 1 (13<sup>th</sup> April 2022 at 11:00am). Invited guests included TDs (North Central, Dublin Bay South, Dublin Bay North) and Councillors (Central, North Central and South East);
- Boat Tour No. 2 (13<sup>th</sup> April 2022 at 2:30pm). Invited guests included Local Stakeholders (Ringsend Community Services Forum, Sandymount & Merrion Residents Association (SAMRA), River Clubs, Dublin Bay Watch, Clontarf Residents Association, Clontarf Yacht & Boat Club); and
- Boat Tour No. 3 (17<sup>th</sup> May 2022 at 11:00am). Invited guests included Members of the Public or Organisations who sent a submission in response to the VCR (x42) and the Docklands Consultative & Oversight Forum.

Key DPC and RPS staff directly involved in the 3FM Project participated in the Boat Tours and were available to discuss the project in greater depth either in small groups or individually.

The initial responses from the public consultation processes were wide ranging and were made by individuals, community groups, business interests and statutory agencies. The key themes that emerged from the first consultation process are set out in Table 3.4.

**Table 3.4 Issues raised during the First Consultation Process**

<b>Issues raised during the first consultation process</b>
Considerable interest in the project from community groups, individuals, river users and statutory entities.
Broad welcome for early consultation exercise and recognition that the project is at an early stage.
Some queries about the specifics of what is proposed – looking for levels of detail that were not yet available; <ul style="list-style-type: none"> <li>• Bridge design and functionality (e.g.; Will SPAR be an opening bridge?);</li> <li>• Extent of Rail connectivity;</li> <li>• Visual impact;</li> <li>• Would a tunnel be better than a bridge?; and</li> <li>• Measures intended to address flood risk.</li> </ul>
Some consultees wanted the Port to move from the current location and for housing to be developed on port lands.
General welcome for plans to improve public parks, cycleways and heritage sites. Support for enhanced community facilities – Port Park, playing facilities, walkways, and for better public access to the River and for public marina facilities.
Statutory stakeholders keen for additional engagement on proposals: <ul style="list-style-type: none"> <li>• ESB (consistency with ESB Projects/ supportive of SPAR);</li> <li>• TII (Traffic impacts on M50 and Dublin Tunnel/ design of SPAR); and</li> <li>• DCC (Soft values/SPAR/Heritage and community aspects).</li> </ul>
Some questions about flood risk.
Queries about traffic flows and extent to which SPAR will remove HGV traffic from existing public roads.
Importance of ensuring that port activities take account of impacts on residential amenity.
Strong support for the creation of enhanced public marina access and improved access to the River for the local community and clubs.

Welcome for no return to 21 ha project.
Keen interest in the project and a real appetite for ongoing consultation and engagement.

The early-stage consultations and the feedback received played a meaningful role in the evolution of the 3FM Project design and proposals. The consultation process also emphasised specific concerns and issues that DPC needed to carefully address and consider when bringing the project forward for planning consent.

Arising from the first consultation process, DPC responded to the feedback received and made significant changes to the initial proposals as set out in Table 3.5.

**Table 3.5 Key changes to the 3FM Project resulting from the First Consultation Process**

<b>Key changes resulting from first consultation process</b>
The proposed location of the active travel routes along the section of the SPAR after the Tom Clarke Bridge heading towards the Poolbeg Marina, was moved closest to the seaward side for improved views and a more enjoyable travel experience.
The design configurations for the proposed Maritime Village were altered to include improved provision, facilities and access for local sailing and rowing clubs, extended public realm including a new public square, increased landside access to the river and new public slipway facilities. Additionally, the Harbour Operations Centre will be relocated to the Maritime Village.
Current Lo-Lo facilities in Area K will be relocated away from residential areas.
Whilst operated as a public road, the SPAR will have restricted access, confined to commercial vehicles, public transport, and blue light services, thereby removing heavy traffic serving the Port and industrial facilities in the Poolbeg Peninsula from public roads adjacent to residential areas.
Improved public access to the Maritime Village from both the SPAR and Ringsend will be assured through new pedestrian crossings.
A revised Community Gain proposal to include new proposals for recreation, public realm, community and heritage, including; <ul style="list-style-type: none"> <li>• New cycle and pedestrian paths</li> <li>• New Port Park with playing pitches and dog park</li> <li>• €2m Community Benefit Fund for Education, Heritage and Maritime Skills Projects within the Poolbeg Area</li> <li>• New Public Access Feasibility Study for the Great South Wall and €1m funding to implement study recommendations.</li> </ul>
Plans for enhanced landscaping, screening, and buffers at key locations as part of overall boundary softening with the port interface.
Proposals to recognise and enhance the heritage and conservation elements around the Poolbeg Peninsula, especially around the historic Great South Wall and Pigeon House Harbour.
Allocation of space at Port-owned lands which formally constituted part of the 3FM Project to facilitate the infrastructure required for offshore renewable energy infrastructure – this will form part of a separate and distinct planning application by Codling Wind Park.

The submissions received thereby fed directly into the scope and evolution of the 3FM Project outline design.

### **3.4.4.2 Second Public Consultation Process (March – May 2023)**

The second public consultation process for the 3FM Project was initiated on 21<sup>st</sup> March 2023 and continued until 15<sup>th</sup> May 2023. Unlike the first consultation process, which had been conducted during the COVID-19 pandemic, this exercise was not constrained by public health restrictions and a number of in-person events were held. It was decided to retain the Virtual Consultation Room which had been heavily accessed previously

as the feedback had been universally positive that the format allowed for effective engagement and an understanding of the key elements of the project. The consultations were based on a discussion of the 3FM Project Preliminary General Arrangement Drawing (February 2023) as shown as Figure 3.3.



Figure 3.3 General Arrange for the Proposed Development (February 2023)  
Note: this General Arrangement is assessed as Option 3 in Chapter 4, Assessment of Alternatives.

The Virtual Consultation Room (VCR) adopted the same format as the first consultation process and its content was updated to take account of modifications to the project arising from the initial feedback, subsequent stakeholder engagement and changes arising from additional survey or technical assessment work.

The VCR was advertised through Street Teams undertaking leaflet drops and displaying Posters in local shops and businesses as well as through Social Media Channels.

A series Public Information Days on the 3FM Project took place at Poolbeg, Ringsend and Clontarf to allow face-to-face interaction between interested parties/members of the public and key DPC and RPS staff directly involved in the 3FM Project. The venues and dates of these events are as follows:

- Poolbeg Public Information Day held at Poolbeg Yacht and Boat Club, 18<sup>th</sup> April 2023;
- Ringsend Public Information Day held at Clanna Gael Fontenoy GAA, 19<sup>th</sup> April 2023;
- Clontarf Public Information Day held at Scoil Uí Chonaill GAA Club, 20<sup>th</sup> April 2023.

A consultation letter and information on the 3FM Project was also issued to 46 statutory and non-statutory bodies listed in Table 3.6 in March 2023 to coincide with the launch of the second public consultation phase of the project. The consultees were invited to make a submission on the proposed development and outline any issues which they would like to see addressed in the EIAR and NIS.

**Table 3.6 Statutory and Non-Statutory Bodies consulted to coincide with the launch of the second public consultation phase of the 3FM Project**

Consultee List		
Dept. of Housing, Local Government & Heritage (DHLGH)	Department of Environment, Climate and Communications	Dept. of Agriculture, Food and the Marine (DAFM)
Environmental Protection Agency (EPA)	Office of Public Works (OPW)	South Dublin County Council (SDCC)
Fingal County Council	Dún Laoghaire Rathdown County Council	Eastern and Midland Regional Assembly
Dept. of Transport	National Transport Authority (NTA)	Transport Infrastructure Ireland (TII)
Commission for Railway Regulation	Iarnród Éireann (Irish Rail)	Health and Safety Authority (HSA)
Commissioners of Irish Lights (CIL)	Royal National Lifeboat Institution (RNLI)	Arts Council
Heritage Council	Fáilte Ireland	An Taisce
Waterways Ireland	Bord Iascaigh Mhara (BIM)	Sea Fisheries Protection Authority (SFPA)
Marine Survey Office (MSO)	Marine Institute	Geological Survey of Ireland (GSI)
Birdwatch Ireland (BWI)	Irish Whale and Dolphin Group (IWDG)	Irish Seal Sanctuary (ISS)
Uisce Éireann	Eir	Electricity Supply Board (ESB)
Gas Networks Ireland	Department of Education and Skills	Department of Enterprise, Trade and Employment (DETE)
Dept. of Foreign Affairs	Department of Health	Health Service Executive (HSE)
Coillte	Development Applications Unit (NPWS & NMS)	Inland Fisheries Ireland (IFI)
EirGrid	Dublin City Council (DCC)	ESB Networks
Department of Finance/Revenue Commissioners		

Nine substantive responses were received from the Statutory and Non-Statutory Bodies consulted as part of the EIA Process. A summary of the responses received from the consultees is set out in Table 3.7.

**Table 3.7 Summary of key stakeholder responses from statutory agencies (May 2023)**

No	Consultee	Comment
1	Eamon Ryan TD Minister for Transport	<ul style="list-style-type: none"> <li>3FM places continued reliance on unsustainable models of maritime trade and logistics</li> <li>These run counter to national climate, circular economy, housing and biodiversity objectives</li> <li>DPC growth assumptions excessive</li> <li>3FM needs to embrace Rail Freight</li> <li>Nature Park needs to be extended into Area O</li> <li>3FM by relying on road haulage will not contribute to decarbonisation objectives</li> </ul>
2	Jack Chambers TD	<ul style="list-style-type: none"> <li>3FM is required to meet national capacity constraints</li> <li>3FM is supported by official Government Policy</li> <li>DPC growth assumptions are reasonable</li> </ul>

No	Consultee	Comment
	Minister of State Dept. of Transport	<ul style="list-style-type: none"> <li>Rail freight usage has limits as a viable alternative to meet required capacity</li> </ul>
3	Dublin City Council (DCC)	<ul style="list-style-type: none"> <li>Ensure that land uses proposed are consistent with the Dublin City Development Plan 2022-2028 – specifically for the Maritime Campus within area zoned Z9 and the part of Area O extending into Z9 (Amenity and Open Spaces) and Area K.</li> <li>SPAR Bridge needs to be a public road</li> <li>Greater clarity on access to Maritime Village is required</li> <li>Want part of AREA O to be used for the District Heating Energy Station</li> <li>Want the SPAR Bridge to run parallel to Tom Clarke Bridge and not at an angle</li> <li>Seeking advance consultation on EIAR Scoping (Roads and Conservation)</li> <li>Strong support for DPC approach to conservation</li> </ul>
4	Transport Infrastructure Ireland (TII)	<ul style="list-style-type: none"> <li>Need for a detailed assessment to be undertaken of project which demonstrates the protection of the integrity of the Dublin Tunnel, in terms of capacity, safety and efficiency.</li> <li>Wants engagement with DPC to address this issue</li> </ul>
5	An Taisce (Limerick Branch)	<ul style="list-style-type: none"> <li>Expansion of Dublin Port at odds with balanced regional development, Climate Action Plan and Circular Economy Strategy.</li> <li>Allege that 3FM will lead to a 75% increase in M50 HGV traffic</li> <li>Rail is a cornerstone in tackling transport emissions</li> <li>DPC growth potentially undermines Foynes growth</li> </ul>
6	Electricity Supply Board (ESB)	<ul style="list-style-type: none"> <li>Concern about Areas K&amp;N impacting on tidal flow with negative impacts for ESB Generation</li> <li>Concerned about Area N and the impact on Poolbeg Power Station intake and outflow.</li> <li>Need to ensure the requirement of ESB Networks in terms of cabling</li> </ul>
7	Department of Housing, Local Government & Heritage (NPWS)	<ul style="list-style-type: none"> <li>Concern over impact of increased footfall on the Peninsula due to better Active Travel provision</li> <li>Concern about impact on Artic Terns and increased risk of rat predation of the Tern Colonies</li> <li>Concern about impact of changes by Area N on the outfall and the impact on birds that use that area - especially Godwits.</li> <li>Concern over the impact of dog disturbance on the Qualifying Interests of the nearby Natura 2000 sites</li> <li>Require a baseline bird survey to be carried out on bird usage of the area &amp; surveys of mammals including otters, bats, badgers</li> <li>Require a wide buffer between Area O and the Nature Park</li> <li>Positive support for DPC's engagement with the NPWS</li> </ul>
8	Iarnród Éireann (Irish Rail)	<ul style="list-style-type: none"> <li>Does not support the 3FM Project as it fails to integrate or future proof rail into the project.</li> <li>Wants rail freight access to the 3FM Project.</li> <li>Argues that 3FM is contrary to national policy, EU policy and the Dublin Port Masterplan 2040</li> </ul>
9	National Transport Authority (NTA)	<ul style="list-style-type: none"> <li>Wants SPAR to be designed, planned and appraised by DPC in conjunction with NTA/TII &amp; DCC and has specific detailed observations on Luas, Barriers, and connectivity with the broader road network</li> <li>Single track Luas would not be supported as part of a Luas extension to Poolbeg.</li> <li>Want to ensure that the 3FM project can have regard to the need to protect the national road network, including the M50 and the Dublin Tunnel.</li> <li>Require greater detail on the tie-ins with the wider GDA Cycle network.</li> <li>Matters of detail need to be addressed before the project can be supported without reservation</li> </ul>

Following receipt of the observations, a series of follow-up consultation meetings were held including:

- Department of Transport Officials 19<sup>th</sup> May 2023; and
- Eamon Ryan, TD Minister for Transport 26<sup>th</sup> May 2023 (attendance at DPC Board Meeting)

The second public consultation processes attracted considerable participation and feedback from a wide range of stakeholders including:

- Private individuals;
- National and Local Government;
- Public representatives;
- Residents associations;
- Commercial undertakings;
- Community sports groups;
- Statutory undertakings;
- Trade Organisations; and
- Non-governmental and charitable organisations.

The process resulted in the following inputs:

- There were 9,795 visits the website (84% from Ireland; 80% from the Dublin area);
- There were 145 submissions received (39 of which were largely identical and based on a template); and
- The Public Information Days attracted over 200 visitors across the three Centres.

Several bilateral follow-up meetings were organised with community groups, public representatives and organisations, including:

- The Docklands Consultative Forum;
- The Docklands Business Forum; and
- Sandymount and Merrion Residents Association (SAMRA).

While there was a broad level of participation in the second consultation process, a range of consistent themes emerged in the feedback received from consultees. There were a large number of submissions that were supportive of the 3FM Project, either in its entirety or in respect of specific elements. In particular, the proposals for the Maritime Village received strong support and encouragement from a range of sports, community and local groups and organisations. The key elements of the supportive submissions are summarised in Table 3.8.

**Table 3.8 Supportive Observations made during the Second Public Consultation Process**

<b>Supportive Observations made during the Second Public Consultation Process</b>
The 3FM Project is required to meet capacity constraints, the growth assumptions on which the project is based are reasonable and the project is supported by Government Policy.
Strong support for the DPC approach to conservation and heritage.
Operators in the Port are already experiencing capacity constraints and 3FM is an important and welcome strategic initiative.
The new Turning Circle is very welcome to aid safe navigation and the manoeuvrability of vessels.
Positive response to early engagement and consultation on the 3FM Project by DPC.
From a business perspective there is a strong requirement to provide capacity to stay ahead of demand.
Port lands should not be used for non-port purposes.

Any increased role for rail in Dublin Port must be based on a solid independently reviewed business case.
Important to maximise the potential of Dublin Port.
The growth in Dublin's population, and trading economy justify the need for 3FM.
Maritime Campus will be a real addition for the people of Dublin.
Welcome for increased amenity provision, playing field and active travel routes.
The proposal to construct the Southern Port Access Route as a public road was welcomed.

There was also feedback that was negative, or which raised issues or concerns about aspects of the 3FM Project. The key elements of such feedback received are set out in Table 3.9 together with an initial response by DPC to the relevant point made.

**Table 3.9 Concerns raised during the Second Public Consultation Process**

Observation	DPC comment
<b>The 3FM Project must comply with national policies on climate action, the circular economy, housing, and biodiversity.</b>	DPC is acutely aware of the requirement that the 3FM Project is advanced in compliance with and with regard to all relevant national policies. This applies to both the development of the project and the subsequent operation of the facilities. Furthermore, DPC will need to demonstrate such compliance in any planning application to An Bord Pleanála before planning consent can be secured.  Additionally, DPC notes the strong policy support for the 3FM Project in the National Planning Framework, the National Development Plan, National Ports Policy, the Regional Spatial and Economic Strategy and the Dublin City Development Plan.
<b>The 3FM Project places continued reliance on unsustainable modes of maritime trade and logistics.</b>	Modes of maritime trade are set internationally and as a major port in an island nation, DPC must anticipate and respond to the realities of these trade modes. DPC believes that this can be done in a way that supports sustainability and maximises opportunities to reduce emissions.
<b>The growth assumptions on which the 3FM Project is based are excessive and do not justify a project of this scale and nature.</b>	The priority of all mercantile ports is to ensure that capacity remains ahead of demand. Taking a range of assessments and projections into consideration, DPC believes that there is a reasonable basis for the growth assumptions stated across the different cargo modes.  In particular, DPC is keenly aware that it will be necessary to demonstrate that the 3FM Project is necessary, has a sound rationale, that the capacity cannot be delivered by any other alternative means and that the MP3 Project it can be delivered in accordance with proper planning and sustainable development.
<b>The 3FM Project needs to embrace rail freight.</b>	Dublin Port is rail connected and the areas to be developed as part of the 3FM Project will be rail enabled.  Dublin Port has been an active supporter of rail freight for many decades.  Demand remains the key challenge for rail freight in Ireland with volumes continuing to decline. This is a function of a lack of geographic scale, low population density and small volumes. In addition, a world class route to market system linking Dublin Port to the M50 and the national motorway network via the Dublin Tunnel offers a highly competitive and effective alternative.  DPC has advanced proposals to Iarnród Éireann to increase rail access to Dublin Port, specifically by developing Iarnród Éireann's North Wall Freight Depot which is adjacent to the Port. This solution would provide access to the whole Port without adversely impacting on critical port capacity.

Observation	DPC comment																
	Ultimately, it will be a matter for Iarnród Éireann to develop a detailed and costed business case for investment in rail freight.																
<b>Rail is a means of decarbonising freight and should form a far greater part of the 3FM Project</b>	<p>Dublin Port is already rail connected and the 3FM Project will also be rail enabled. Rail freight currently constitutes less than 1% of volume within Dublin Port with 50% of this volume coming from one customer (Boliden). Rail freight volumes have been declining steadily over the past decade.</p> <p>According to an Origin Destination Study completed for DPC by RPS, 73% of Port volume emanates from within 90kms of the Port. Initial analysis by RPS suggests that only a small portion of current Port volumes are suitable for rail freight.</p> <p>These are matters that will be addressed in the All Island Strategic Rail Review.</p>																
<b>Parts of the 3FM Project area should be used for recreation and amenity purposes, including a nature reserve, rather than commercial purposes.</b>	<p>The 3FM proposal is advanced in full conformity with the land use and zoning objectives of the Dublin City Development Plan, adopted in 2023 and the Poolbeg West SDZ, adopted in 2019.</p> <p>The 3FM Project includes specific proposals to create additional recreation and amenity space including the creation of new public realm, active travel, new parks and wildflower meadows. Some additional land will be ceded by DPC to the Irishtown Nature Park following the second consultation process.</p>																
<b>There are no capacity constraints in Dublin Port and the Port could operate more efficiently within its existing developed sites.</b>	<p>The 3FM Project is the final opportunity to develop additional capacity at Dublin Port. There are already capacity constraints evident at Dublin Port, and the allocation of a significant part of the Port Estate to State Authorities in the context of Brexit has exacerbated this challenge, and has been highlighted by DPC.</p> <p>DPC remains committed to ensuring that capacity remains ahead of demand to prevent disruptions to mercantile trade through the risk of a national port capacity shortage with consequent constraints on economic development and the flexibility to deal with changes in mercantile trade.</p> <p>Dublin Port is already an exceptionally efficient port given the throughput for the land estate available to DPC, and measures taken to intensify its use (development of Dublin Inland Port, Dwell Time Initiative &amp; Pricing Policy for Customers, etc). This can be seen in a comparison with other European Ports, which suggests that DPC is securing very effective land use maximisation from the existing DPC estate:</p> <table border="1" data-bbox="711 1368 1378 1610"> <thead> <tr> <th>Port</th> <th>Tonnes 2021</th> <th>Land Area</th> <th>Tonnes per ha</th> </tr> </thead> <tbody> <tr> <td>Barcelona</td> <td>65 m</td> <td>1,082 ha</td> <td>60,000</td> </tr> <tr> <td>Rotterdam</td> <td>468 m</td> <td>7,833 ha</td> <td>59,000</td> </tr> <tr> <td>Dublin</td> <td>34.9 m</td> <td>309 ha</td> <td>112,000</td> </tr> </tbody> </table> <p>DPCs demand / capacity plans already factor in ongoing efficiency increases across the supply chain.</p>	Port	Tonnes 2021	Land Area	Tonnes per ha	Barcelona	65 m	1,082 ha	60,000	Rotterdam	468 m	7,833 ha	59,000	Dublin	34.9 m	309 ha	112,000
Port	Tonnes 2021	Land Area	Tonnes per ha														
Barcelona	65 m	1,082 ha	60,000														
Rotterdam	468 m	7,833 ha	59,000														
Dublin	34.9 m	309 ha	112,000														
<b>The Southern Port Access Route (SPAR) should be a public road, which caters for public transport.</b>	The SPAR will be a public road, albeit with restricted access which will cater for Port traffic, heavy commercial traffic serving other facilities on the Poolbeg Peninsula, Public Transport and blue light services.																
<b>The 3FM Project could have an adverse impact on flora, birds and other fauna.</b>	Dublin Port exists within an area with significant levels of protected sites within the Natura 2000 network. DPC attaches considerable priority to the protection of natural habitats and is proud of the positive role that the Port has played in working closely with NGOs and State agencies to ensure that the natural environment is protected.																

Observation	DPC comment
<p><b>Dublin Port should relocate to another unspecified location on the East Coast and the land be developed for housing.</b></p>	<p>The 3FM Project is entirely consistent with a range of national, regional and local planning policies on land that has been zoned by the local authority for port purposes as recently as 2022. Dublin Port has been developed over 300 years and is purpose built for Port use. It has the capacity to expand upon its existing lands. Located at the heart of the market and the economy that it services it is the entry point to a world class route-to-market system which includes the Dublin Tunnel, the M50 and the national motorway network – a point which cannot be overlooked when discussing a Port’s competitive and core strategic position.</p> <p>It is extremely doubtful that there is any other site on the East coast to which Dublin Port’s activities and the wider supporting transport infrastructure could be relocated having regard to the enormous cost and permitting challenges that any such development would face. It is also likely that any such mega-project would take between 20 – 30 years during which time the needs of the national economy would still need to be served. Additionally, diverting trade currently arriving in Dublin Port to other ports does not represent a sustainable option given the requirement to bring goods back to the Dublin area which is where the core market served by Dublin Port is based.</p>
<p><b>Area O should not be used for container storage and should be used for parkland, amenity and nature</b></p>	<p>Area O is required to service imports arriving in LoLo mode to Dublin Port and was identified as such in the Dublin Port Masterplan (reviewed 2018). It is not intended that Area O will be a static storage area, but instead a short stay transshipment area for containers once they arrive in Ireland. The use of Area O for this purpose is entirely consistent with the Dublin Port Masterplan, the land use and zoning objectives in the Dublin City Development Plan and the Poolbeg West SDZ.</p> <p>Area O will be designed and operated in a way that is consistent with the land use and takes account of the need to protect residential amenity. This will be achieved through low stack heights, the use of electric gantries and transshipment vehicles and significant levels of investment in screening, planting and noise reduction. The 3FM Project also includes the creation of significant new parkland, amenity and recreation space, including the allocation of some additional land to the Irishtown Nature Park and the creation of a new wildflower meadow adjacent to Port Park.</p>
<p><b>The 3FM Project will need to take account of all other developments in Dublin Bay</b></p>	<p>As a core part of the development consent applications, DPC will be obliged to provide an assessment of the 3FM Project in combination with all other relevant projects.</p>
<p><b>The 3FM Project will bring additional noise, traffic and pollution as well as an eyesore.</b></p>	<p>DPC will demonstrate that the project will not have adverse impacts from noise, traffic, pollution or visual amenity perspectives and detailed assessments and reports will be required in this respect. The research to date indicates that the project will in fact make significant improvements in noise, traffic, and pollution.</p>
<p><b>The impact of 3FM on the adjoining road network (including the Dublin Tunnel) needs to be carefully assessed.</b></p>	<p>DPC is engaging with DCC, TII and NTA to discuss the traffic and transport issues. Detailed traffic assessments are being prepared and will be furnished as part of the planning application. The SPAR, by removing freight and commercial traffic from adjoining existing roads is likely to be a significant improvement on existing traffic. Additionally, the development of Active Travel Routes will aid permeability for pedestrians and cyclists.</p>
<p><b>The SPAR should facilitate the expansion of the LUAS into the Poolbeg Peninsula</b></p>	<p>A LUAS extension to Poolbeg forms part of the Transport Strategy for the Greater Dublin Area, 2022-42, and will be subject to future route selection, planning, design, and appraisal work by the National Transport Authority (NTA). The route has yet to be determined. To preserve the option of choosing such a route adjacent to the SPAR in the future, the SPAR Bridge has been designed such that it could be subsequently modified to accommodate a dual track LUAS, if this were the NTA’s final chosen LUAS alignment.</p>

Observation	DPC comment
<b>Will rising sea levels be factored into the 3FM Project?</b>	Yes – as part of the design and assessment of the 3FM Project, detailed assessments will be made of tidal and flood levels. Information on these assessments will be made available in the planning application to An Bord Pleanála.
<b>The 3FM Project does not take account of the impact on leaseholders operating in the port estate and the impact that the development will have on their businesses.</b>	<p>The 3FM Project takes full account of the impact of the proposed development on all stakeholders, including leaseholders. DPC engages with all leaseholders and will continue to do so in the context of the development of the 3FM Project.</p> <p>The 3FM Project includes the redevelopment of DPC-owned lands which currently host a small number of tenants. DPC will take possession of these sites prior to commencement of the construction phase. DPC holds the legal entitlement of these sites as the lessor. DPC intends to negotiate with each of the tenants, and give as much notice as possible, to reach a settlement prior to the sites being vacated. Ultimately DPC has the authority to compulsory purchase order (CPO) the sites if a negotiated settlement is not possible, but will only initiate the CPO process as a last resort.</p>
<b>Will 3FM negatively impact on the quality of the sea water in the area, particularly given the high numbers of people sea swimming at present?</b>	DPC has engaged extensively with the Marine Institute in the preparation of the 3FM Project to ensure that water quality is not adversely impacted. DPC is conducting detailed water quality assessments and will be required to demonstrate that water quality is not adversely impacted by the 3FM Project with consequent negative impacts for fisheries, the natural environment, and adjacent recreational users, including swimmers, divers and fishers.
<b>Wind turbines should be included as part of the project within the Port Estate</b>	DPC is taking a major step to facilitate renewable energy, by making land available to the Codling Wind Park Project for the construction of an onshore substation to facilitate the transmission and distribution of Offshore Renewable Energy from the Codling Bank to the National Transmission System.
<b>The 3FM Project will add considerably to congestion in Dublin, including an up to 75% increase in M50 traffic and increased traffic stagnation in the City Centre.</b>	3FM will not lead to a 75% increase in traffic on the M50. Equally, the project will not increase congestion in Dublin City Centre, given that HGVs are excluded from the city and typically exit from the Port through the Dublin Tunnel, rather than secondary routes. As part of the planning application, DPC will be required to identify the traffic impact from the 3FM Project and to demonstrate to An Bord Pleanála that the traffic arising will not adversely impact on traffic flows. In fact, the advent of the SPAR should assist with traffic flows, by taking commercial vehicles off existing adjoining roads.
<b>Dublin Port should follow the European example of moving out of the City and to a new greenfield site.</b>	European Ports are not moving away from urban areas. The norm, rather than the exception, for European port cities is to remain close to their core markets and to remain a key part of the urban settlements that the Port contributed to establishing. Ports are focusing on Port/City integration with their adjoining cities and communities – Dublin Port has undertaken an existing Port-City Integration Programme and the 3FM Project builds on this initiative.
<b>Rosslare should be an effective substitute for Dublin Port</b>	<p>Rosslare Europort will continue to play an important role in complementing Dublin Port. However, it has nowhere near the potential capacity to replace Dublin Port.</p> <p>At present, Rosslare Europort handles 10% of National Freight volume, 13% of European trade and is running close to capacity.</p> <p>By contrast, Dublin Port handles 80% of national freight, 68% of European cargoes, sits on an existing brown field site with potential to build additional Ro-Ro and Lo-Lo capacity.</p> <p>Rosslare Europort handles Ro-Ro freight only and as European demand increases, Lo-Lo facilities will become increasingly important.</p> <p>In terms of location, Rosslare Europort is located 155kms from Dublin. Assuming berth and land capacity can be secured, a major investment in the</p>

Observation	DPC comment
	<p>existing train line and freight handling facilities would also be required in order to move freight by rail.</p> <p>Given challenges with the Dublin/Rosslare rail line, it is possible that freight from Rosslare to Dublin may need to come via Waterford through the currently closed Rosslare to Waterford rail line.</p> <p>Additional capacity would be welcome in Rosslare Europort however its potential will be limited relative to the scale required.</p>
<p><b>Why bother with the 3FM Project if Dublin Port is going to reach capacity by 2040?</b></p>	<p>DPC has indicated that Dublin Port will reach capacity in or around 2040. Following 2040 Dublin Port will continue in its role as Ireland’s largest port – a factor of its location, connectivity with national networks and navigability. Post 2040 it is likely that <i>additional</i> port capacity will be required on the East Coast to augment Dublin Port’s throughput. Given the long tail in any new infrastructure development, this additional port capacity could take up to 20 years to bring to fruition. It will not be a replacement for Dublin Port, but will likely work in tandem with Dublin Port to serve the national economy.</p>
<p><b>Dublin Port has no regard for Climate Action or reducing carbon emissions</b></p>	<p>DPCs plans are fully aligned with Climate Action goals. Dublin Port is keenly aware of the need to meet the targets set out in national policy in the form of the Climate Action Plans and can demonstrate the manner in which the 3FM Project can meet the objectives and targets set out in the Climate Action Plans. Separately and through targeted initiatives DPC is working to reduce its carbon emissions - through low carbon fuel options for vehicles, electricity services for shore to ship power, facilitating the connection of Offshore Renewable Energy to the national grid as well as facilitating efficient rail connectivity.</p>
<p><b>Dublin Port lands are ideal for housing</b></p>	<p>Dublin Port is specifically zoned for port uses and not for residential use. Most of the Dublin Port lands are in areas with a high industrial or utility function and both within and adjacent to the Port Estate. The area is also traversed with the infrastructure required to service these facilities, including HV power cable and pipelines carrying a range of materials. These areas are not suitable for residential development and in many instances are expressly excluded from such use as a consequence of Health and Safety requirements.</p>

Following completion of the Second Public Consultation Process, DPC published a ‘Report on Consultation process 2021 to 2023’ which was circulated to all those who engaged during the consultation process. The report is presented in Appendix 3-2.

### 3.4.4.3 DPC Response to the Public Consultation Process

DPC further reflected on the feedback received and sought to refine the 3FM Project Proposal in light of the concerns, expectations and requirements brought forward during the consultation exercise.

The following update on the 3FM Project was made as a direct response to the public consultation process and engagement with key stakeholders:

- DPC undertook a review of the consideration of alternative layout options which forms a key part of the planning application and assessment process. This resulted in a significant layout change concerning the provision of Lo-Lo storage capacity on the Poolbeg Peninsula.
- It had been originally proposed that a Lo-Lo storage facility would be located in lands directly south of the Dublin Waste to Energy facility, referred to in the Dublin Port Masterplan as Area O.

- Following the consultation process and extensive engagement with relevant stakeholders, it became apparent that another location, Dublin Port Masterplan Area K which was identified for development at a later date within the lifespan of the Masterplan, could be used to provide similar capacity.
- As a consequence, Area O lands will be reconfigured as follows:
  - A portion of lands at the eastern end of Area O will be allocated to the Irishtown Nature Park in accordance with zoning requirements. This land represents an additional 1.1ha to the Nature Park.
  - An additional portion of Area O will be made available to Dublin City Council to facilitate the provision of a District Heating Scheme adjacent to the Waste to Energy plant. This is the preferred location for Dublin City Council for the associated District Heating Energy Station. The planning approval for the District Heating Energy Station will be part of a separate planning application by Dublin City Council and will not form part of the 3FM Project application.
  - To facilitate the movement of the Lo-Lo activities at Area O to another port location, a portion of the Area O lands will be used for a transit Ro-Ro trailer yard to provide storage capacity to maximize the efficiency of the proposed Ro-Ro Terminal at Dublin Port Masterplan Area K. This port use will not involve any stacking of containers or trailers. The Ro-Ro operation will not be visible behind an existing bund and future green buffer zone.
  - As a consequence of these changes, an additional area of land to the west of Area O which had formerly been designated for the District Heating Scheme will become a wildflower meadow and be directly adjacent to the new Port Park. This will represent a new public park and recreation area of 2.5ha.
  - All of these proposals conform with the appropriate zoning for the Area O lands under the Poolbeg West SDZ.

These changes reflect the meaningful and effective consultation process which has taken place on the 3FM Project and demonstrates the manner in which DPC has considered the inputs from a range of sources, including public representatives, local community groups, relevant stakeholders and the public.

#### **3.4.4.4 Consultation with Local Community and Interest Groups (2021 – 2023)**

DPC issued a letter to the following groups set out below at the outset of the 3FM Project in 2021 offering the opportunity for DPC to meet and discuss the 3FM Project, to outline the rationale for the project and to give an indication of the scope of the proposed development. DPC also asked for initial feedback to the outline of the proposed project and to address any questions that each group may have about the development at this early stage.

- Elected Members (TDs and Councillors)
- Stella Maris Rowing Club
- St Patricks Rowing Club
- Irish Nautical Trust

- Half Moon Swimming Club
- Poolbeg Yacht & Boat Club
- 1<sup>st</sup> Port Sea Scouts
- Ringsend Registered Fishermen & Private Boat Owners Club
- South Bank Combined Boat Clubs Development Committee
- Sea Safari
- Dublin Bay Old Gaffers Association
- Poolbeg Training CLG (Rinn Voyager)
- Raytown Angling
- Liffey City Currach Regatta
- Ringsend Community Services Forum
- Ringsend & Irishtown Tidy Towns & Environment
- Docklands Oversight and Consultative Forum
- Diving Ireland (Irish Underwater Council)

Engagement with the Local Community and Interest Groups thereafter intensified through direct communication by DPC's dedicated Communication Staff (Charlie Murphy and Edel Currie).

DPC consulted widely, including the following organisations and groups of residents:

- Ringsend Community Services Forum (RCSF); an umbrella group representing 72 local groups including Resident Associations. Regular updates on the 3FM Project were filtered through to the individual member groups via RCSF Newsletters;
- Residents at Coastguard Cottages and Pigeon House Road;
- Sandymount & Merrion Residents Association (SAMRA);
- Clontarf Residents Association; and
- Dublin Bay Watch

Several meetings also took place with Ringsend River User Groups with a focus on the proposed Maritime Village. The interaction between DPC and key stakeholders is shown schematically on Figure 3.4.

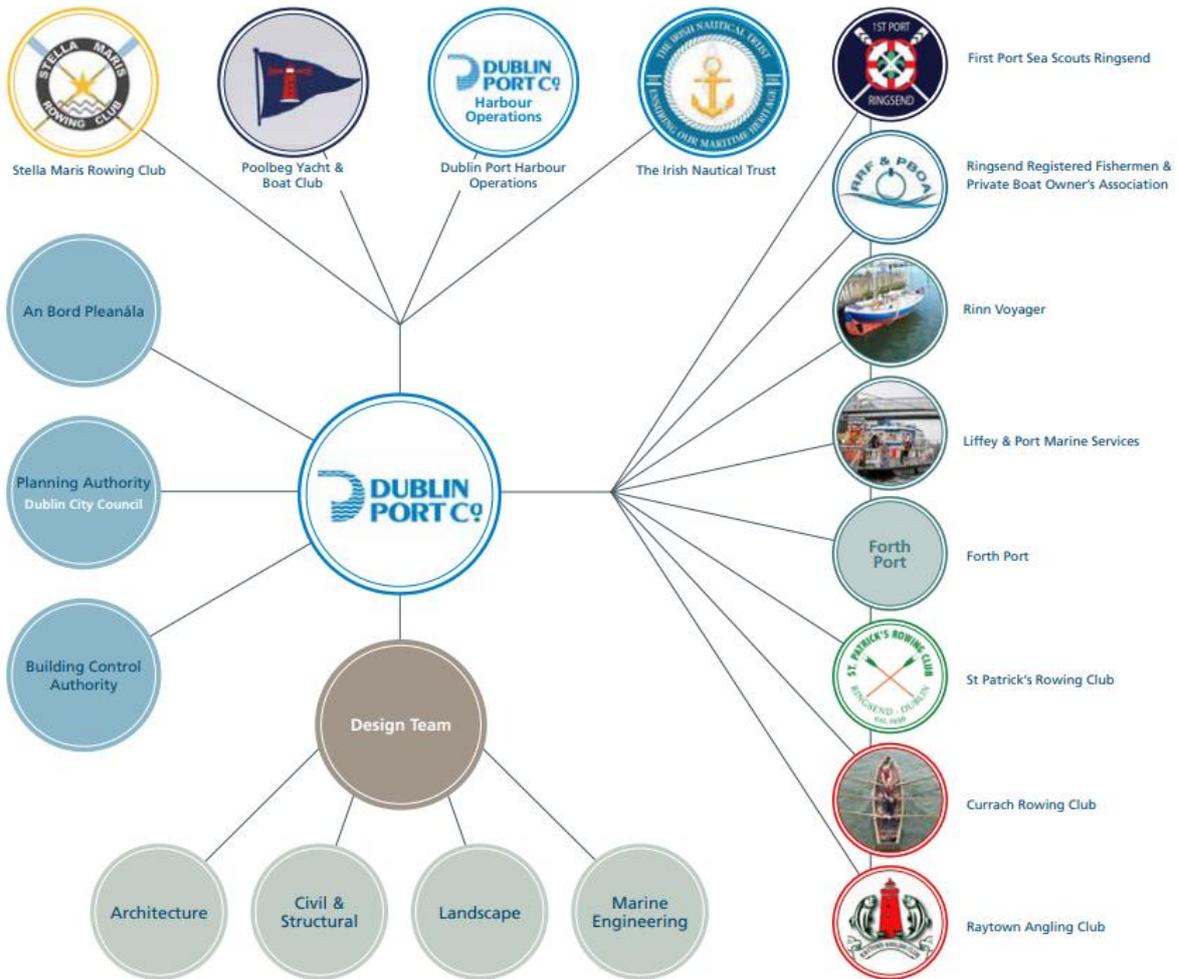


Figure 3.4 Schematic Representation of the interaction between DPC and key stakeholders with respect to the development of the Maritime Village

To aid the consultation process, the Ringsend River User Groups organised themselves such that their views would be represented by the following three organisations:

- Stella Maris Rowing Club;
- Poolbeg Yacht and Boat Club; and
- Ringsend Registered Fishermen and Privation Boat Owners Clubs.

This approach was effective in delivering a Maritime Village footprint acceptable to all parties.

### 3.4.5 Additional Pre-application Consultation with Prescribed Bodies and Key Stakeholders (2021 - 2023)

Consultation with Prescribed Bodies and Key Stakeholders continued during the evolution off the 3FM Project Outline Design between September 2021 and December 2023.

### **3.4.5.1 Consultation with key stakeholders adjoining the 3FM Project Site**

Consultation included series of detailed discussions with key stakeholders whose existing or proposed works adjoin the 3FM Project.

#### ***Electricity Supply Board (ESB)***

A series of workshops and meetings took place with ESB, including site visits to the Poolbeg Generating Station, to attain a detailed understanding of the existing constraints, support the engineering design process to enable the 3FM Project and ESB Works (existing and future) to coexist, and to develop environmental mitigation measures through engineering design. This included an assessment of ESB's existing cooling water intakes, cooling water discharge channel and existing plant proximate to both the foreshore and Pigeon House Precinct.

Through these discussions, ESB confirmed they would allow emergency services (Blue Light) access to the proposed 3FM Project Lo-Lo Container Terminal (Area N) via the ESB Generating Station site.

#### ***Uisce Éireann***

A series of workshops and meetings also took place with Uisce Éireann, including site visits to the Ringsend Wastewater Treatment Plant, again to attain a detailed understanding of the existing constraints, support the engineering design process to enable the 3FM Project and Uisce Éireann Works (existing and future) to coexist, and to develop environmental mitigation measures through engineering design. This included an assessment of Uisce Éireann's existing treated sewage discharge to the ESB cooling water discharge channel and intermittent discharges of screened storm water released from retention tanks proximate to the proposed 3FM Project Turning Circle.

#### ***Codling Wind Park***

DPC aims to support the Government's policy objectives set out in the Climate Action Plans by providing DPC land for potential use by the offshore wind industry. Towards this end and following the decision by EirGrid plc to provide Codling Wind Park with a grid connection at Poolbeg, DPC has co-operated with Codling Wind Park to assess:

- Codling Wind Park Substation needs on Area M (see Chapter 1, Figure 1.1, for location);
- Cable route requirements through DPC Lands including DPC tenanted areas; and
- Possible requirements for site compounds to construct development.

The co-operation has resulted in the development of a common combi-wall structure at the location where the two proposed projects adjoin (boundary between the Codling Wind Park Substation and the 3FM Project Turning Circle). Both parties also agreed to share site specific environmental data.

#### ***Dublin City Council (DCC) - District Heating Scheme***

DPC aims to support DCC's proposals for a District Heating System derived from heat generated from the Dublin Waste to Energy Facility. The proposed District Heating System was endorsed by The Minister for Environment, Climate and Communications, Eamon Ryan, TD through a press release on 31<sup>st</sup> August 2023.

DCC's proposals are at an early stage of development but are likely to comprise the following elements:

- Connection Point to Dublin Waste to Energy Facility – eastern side of plant
- District Heating Energy Station
  - Water tank required to pressurize the system
  - Standby energy supply (gas or offshore wind)
  - Control room
  - Potential Flue stack for standby energy generation, if required
- Pipework to residential and commercial areas

The overall footprint of the Energy Station will be circa 0.5 Ha.

Through consultation with DCC, it was confirmed that DPC would make the required space available for the proposed Energy Station within DPC Lands zoned for 'Temporary Park / Development Infrastructure' under the Poolbeg West Strategic Development Zone (SDZ), adjacent to Port Park. This would be subject to a separate application for development consent made by DCC.

#### ***DCC - proposal for Point Bridge immediately upstream of Tom Clarke Bridge***

DCC is proposing a new pedestrian and cycle bridge, known as the Point Bridge, immediately upstream of the existing Tom Clarke Bridge. The proposed Point Bridge will be designed to enable a section of the bridge to periodically open to allow for the safe navigation of vessels within the River Liffey, similar to the current operation of the opening Tom Clarke Bridge.

DPC participated in a series of workshops, led by DCC, to review how this project would interact with DPC's requirements for the SPAR opening bridge and to agree measures to ensure these two standalone projects can operate independently.

#### **3.4.5.2 Additional Consultation with Prescribed Bodies and Key Stakeholders**

Continued consultation included further meetings with prescribed bodies as described below.

##### ***DHLGH National Parks and Wildlife Service (NPWS)***

A second Pre-Application meeting with NPWS took place on 8<sup>th</sup> December 2022. A summary of the key issues raised is presented in Table 3.10.

Table 3.10 Second Consultation Meeting with National Parks & Wildlife Service

<b>Key Comments made by National Parks &amp; Wildlife Service</b>
<p><b>Second Pre-Application Meeting 8<sup>th</sup> December 2022 (NPWS)</b></p> <p><b>CDL Tern Colony (NHA)</b></p> <p>The 3FM Project recognises the importance of the CDL Tern Colony being the only colony to host both Arctic Terns and Common Terns. The original proposal of creating additional berthage and transit storage has been replaced with a development of a Turning Circle to avoid any direct impact on the CDL Tern Colony</p> <p>NPWS commented that the following issues would need to be addressed in the EIAR/NIS</p> <ul style="list-style-type: none"> <li>• Potential impact of disturbance from turning vessels</li> <li>• Potential collision from vessels turning</li> </ul> <p>DPC pointed out that large ferries currently turn within the main navigation channel, proximate to the CDL Tern Colony, and that no significant disturbance was likely. An intervention measure was also being proposed to prevent collision between vessels and the Tern Colony.</p> <p>NPWS remarked that this type of evidence would be useful within the 3FM Project EIAR and NIS. NPWS also pointed out that Codling Wind Park had recently undertaken specific Tern disturbance surveys at this location under licence from NPWS. DPC confirmed that they had agreed to share environmental information with Codling Wind Park.</p> <p><b>ESB Tern Colony (SPA)</b></p> <p>NPWS commented that the following issues would need to be addressed in the EIAR/NIS</p> <ul style="list-style-type: none"> <li>• Potential disturbance from the proposed wharf and vessels turning</li> <li>• The stability of the existing ESB 'dolphin' structure</li> </ul> <p>Brent Geese Landing Strip (part of South Dublin Bay and Tolka Estuary SPA)</p> <p>One of very few grasslands protected for use by over-wintering birds. NPWS was of the view that potential loss of habitat at this location would be very problematic.</p> <p>DPC confirmed that the design of the 3FM Project had evolved and been amended to now avoid any impact on this part of the SPA.</p> <p><b>Black Guillemot</b> - Presence at Dublin Port known for past 40-50 years. DPC reported that a Black Guillemot Management Plan had been prepared.</p> <p><b>Otter</b> - It is now known that Otters have returned to the navigation channel. DPC proposed that the 3FM Project would seek opportunities for Otter holts etc to encourage expansion of their range.</p> <p><b>Badger</b> - NPWS reported that a badger sett had been found within the boundary of the Glass Bottle site. The badgers were currently being relocated to the east of Plot O, in close proximity to the Brent Geese Landing strip.</p> <p><b>3FM Active Travel Corridor (southern boundary of the Poolbeg Peninsula)</b></p> <p>NPWS expressed the following concerns:</p> <ul style="list-style-type: none"> <li>• Dog walkers causing disturbance. A fence between the existing informal pathway and the Brent Geese Landing Strip had been strengthened to avoid access from people/dogs to the SPA. This would need to be retained.</li> <li>• A proposal for a boardwalk within the SAC/SPA boundary would be very problematic</li> </ul>

### ***DHLGH Foreshore Unit / Maritime Area Regulatory Authority (MARA)***

DPC provided a briefing of the 3FM Project to DHLGH Foreshore Unit on 26<sup>th</sup> January 2022. A site visit by boat also took place on 28<sup>th</sup> October 2022.

The discussion with the Foreshore Unit was focussed on the requirements of the new consenting process under the Maritime Area Planning Act 2021.

A Pre-Maritime Area Consent (MAC) consultation meeting was held with MARA on 14<sup>th</sup> December 2023. It was confirmed that the 3FM Project does not require a Maritime Area Consent under the Maritime Area Planning Act 2021 as it falls within the time-limited exempting provisions at section 75(4) of the 2021 Act, as inserted by section 277 of the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023.

### ***Dublin City Council (DCC)***

In addition to continued consultation with the DCC Planning and Property Development Section described previously in Section 3.4.2, DPC undertook a number of technical consultations with various DCC Sections during the evolution of the 3FM Project outline design to ensure the 3FM Project was fully aligned to the policies of the Dublin City Development Plan 2022 – 2028. This included consultation with

- DCC Noise and Air Quality Sections
- DCC Water Quality and Waste Sections
- DCC Marine Archaeology Section
- DCC Archaeology, Conservation & Heritage Section
- DCC Traffic & Transportation Section
- DCC Parks and Biodiversity Sections

DPC also host quarterly meetings of a Liaison Group comprising officials from DCC and DHLGH Foreshore Unit which oversee the construction phase of the ABR Project and MP2 Project. The Agenda for these meetings also included discussion on the evolution of the 3FM Project outline design and the development of environmental mitigation measures through engineering design.

A presentation on the 3FM Project was also given to the DCC Dockland Infrastructure Group on 14<sup>th</sup> December 2021, a DCC initiative to co-ordinate proposed projects within the Docklands area.

### ***National Transport Authority (NTA), Transport Infrastructure Ireland (TII), DCC Transport Planning Division***

Traffic and Transportation forms a key element of the 3FM Project and extensive consultation was therefore undertaken with the key statutory authorities during the preparation of the EIAR.

The following key points were agreed during the consultation meetings:

- DPC would facilitate a bus stop and bus turning area adjacent to the Glass Bottle site (Bus Route 82).
- The Traffic & Transportation Assessment (TTA) would take into account NTA Bus Connects future proposals in the environs of the Port.

- The 3FM Project would be designed to avoid traffic tail-backs at the Dublin Tunnel
- The proposed SPAR bridge would be future-proofed to allow for a two-way LUAS connection at the request of NTA who noted:

*“The Transport Strategy for the Greater Dublin Area provides for the delivery of a Luas line to Poolbeg from Dublin City Centre. One of the options for this line is to extend the existing Red Line from its current terminus at The Point directly to Poolbeg via a new bridge over the River Liffey. In designing the Southern Port Access Route (SPAR), consultation with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) was undertaken in order to ensure that the bridge could accommodate this option for the delivery of Luas Poolbeg should it be required. The NTA have provided correspondence to Dublin Port states that they are satisfied that the proposed design of the SPAR bridge could accommodate Luas.”*

- DCC Transport Planning Division welcomed the SPAR. However they stated that 2022 baseline traffic data did not reflect post-Covid recovery conditions. Consequently, the Port and its environs were resurveyed in October 2023.

### ***Iarnród Éireann (Irish Rail)***

Extensive consultation with Iarnród Éireann (Irish Rail) took place during the preparation of the EIAR to ensure there was an agreed solution to enhance the existing rail connections to the Irish Rail Network from the entire Dublin Port Estate (North Port and South Port) and to ensure that the 3FM Project does not compromise the agreed solution.

The primary interactions between DPC and Iarnród Éireann are set out in Table 3.11.

The consultations with Iarnród Éireann led to an agreed solution which would not be compromised by the 3FM Project. The preferred solution is documented in Chapter 4 Assessment of Alternatives.

**Table 3.11 Primary interactions between DPC and Iarnród Éireann**

<b>Date</b>	<b>Commentary</b>
<b>April 2021</b>	Iarnród Éireann publish the All Ireland Strategic Rail Review
<b>2<sup>nd</sup> December 2021</b>	Discussion on 3FM Project and DPC solution to managing Rail. DPC outlined concerns about Iarnród Éireann plans on how to develop rail viz. enhancements for the Dublin Port Estate.
<b>27<sup>th</sup> January 2022</b>	Site visit to Dublin Port common user area and meeting to outline key operational issues with Rail plans in the Alexandra Basin area.
<b>8<sup>th</sup> April 2022</b>	Follow-up discussions from site visit
<b>4<sup>th</sup> September 2022</b>	DPC and Consulting Engineers ARUP meeting at Dublin port to consider rail study of Dublin Port. Communication continued during the preparation of the study.
<b>24<sup>th</sup> October 2022</b>	Iarnród Éireann object to DPC proposed upgrade at Alexandra Road
<b>7<sup>th</sup> November 2022</b>	DPC submission to ARUP on rail issues associated with Dublin Port which outlined main issues with expansion of rail crossing over East Wall Road.
<b>23<sup>rd</sup> November 2022</b>	DPC provide update to ABP on rail following a consultation meeting held between ABP and Iarnród Éireann.

<b>23<sup>rd</sup> December 2022</b>	Iarnród Éireann issue ARUP Report on Irish Ports Capacity.
<b>23<sup>rd</sup> January 2023</b>	Site walk of Iarnród Éireann freight depot followed by a meeting to discuss main changes required to the proposed rail terminal.
<b>15<sup>th</sup> February 2023</b>	Meeting with the Irish Maritime Development Office (IMDO), DPC, ARUP to discuss rail potential in Dublin Port.
<b>6<sup>th</sup> March 2023</b>	Meeting with Iarnród Éireann to discuss results from the ARUP Report.
<b>8<sup>th</sup> May 2023</b>	Key Points Discussed - Project Scope and discussions on the main project objectives, Site Visit and Evaluation of Rail Freight depot - assessment of the site conditions and potential challenges. ARUP Report Analysis and interpretation of results from the ARUP report.
<b>25<sup>th</sup> July 2023</b>	Publication of DRAFT ARUP All Island Strategic Rail Review by Department of Transport and Department for Infrastructure (NI).
<b>26<sup>th</sup> September 2023</b>	Site visit to Iarnród Éireann Freight depot site
<b>29<sup>th</sup> September 2023</b>	DPC make submission to the Draft All Island Strategic Rail Review.
<b>Sept 2023 to April 2024</b>	Options for Rail Freight depot assessed and costed.
<b>21<sup>st</sup> December 2023</b>	Review meeting with Iarnród Éireann
<b>25<sup>th</sup> January 2024</b>	Review meeting with Iarnród Éireann
<b>24<sup>th</sup> April 2024</b>	Meeting with Iarnród Éireann to discuss Memorandum of Understanding (MOU) for Rail work.

### 3.4.6 Proposed Public Consultation Post Submission of 3FM Project Application for Consent

In addition to the significant level of consultation undertaken in the development of the Masterplan and in relation to the 3FM Project to date, a major public information exercise will be undertaken to inform all stakeholders of the 3FM Project when the application is submitted with An Bord Pleanála. The purpose of this information exercise, which is in addition to the statutory notification procedures required in relation to the project, will be to inform the public of the development proposals, the impacts arising and to ensure that they are aware of the opportunities available to them to participate in the development assessment process. A public information campaign will be implemented, including:

- Public notices;
- Advertisements;
- Public consultation sessions in local community centres;
- A newsletter circulated to local residents;
- A mail-shot to public representatives and local community/residents/social and environmental groups; and
- A media information campaign including national and local media through multiple formats.

### **3.4.7 Conclusions on Project Consultation**

The development proposals advanced in the 3FM Project reflect the significant levels of consultation that have taken place since 2017 on the future of Dublin Port.

The various submissions and comments made in relation to the 3FM Project have been fully considered by the consultants in the preparation of the EIAR and by the Applicant in the design of the scheme. Every effort has been made to address all issues raised whether by changes to the design of the 3FM Project and, where possible, mitigation measures have been proposed to minimise the environmental impacts of the 3FM Project.

## 3.5 Project Scoping

### 3.5.1 Scoping Approach

Detailed scoping has been undertaken in respect to the 3FM Project. As stated above, DPC “informally” or voluntarily scoped the contents of an EIAR by engaging in consultations with prescribed and other authorities, bodies and stakeholders and through public consultation, in accordance with the European Commission’s 2017 “Environmental Impact Assessment of Projects Guidance on Scoping” and the EPA’s “Guidelines on the information to be contained in Environmental Impact Assessment Reports (May 2022)”, the latter of which states:

“There can be considerable benefits in the developer engaging in early consultation about the scope of an EIAR to help to identify the relevant issues. This can be done formally (under the legislation) or informally.”

The EPA Guidelines (2022) define “scoping” as follows:

*“Scoping” is a process of deciding what information should be contained in an EIAR and what methods should be used to gather and assess that information. It is defined in the European Commission Guidance (2017) as:*

*‘The process of identifying the content and extent of the information to be submitted to the Competent Authority under the EIA process.’*

*Scoping is best carried out by personnel having appropriate expertise and relevant prior experience. Knowledge of the characteristics of the project type and of the sensitivities likely to be present in the receiving environment are particularly useful for scoping.*

*[...]*

*Scoping is carried out on a case-by-case basis because the significant issues for different projects are unlikely to ever be identical. However, there are standard issues that a developer should consider for each project to establish whether they apply in specific cases. The Advice Notes contain guidance on relevant environmental factors for principal project types.*

*The potential for likely significant effects throughout different phases of the proposed project, are considered as far as possible at scoping stage – whether they would individually require consent or not. These include, as relevant, site investigations, construction, commissioning and operation to eventual decommissioning. Scoping also considers the range of alternatives to be considered in an EIAR.*

In conducting the scoping process, and in preparing this EIAR, consideration has been given to publications including the Advice Notes and various other documents.

The scoping of the 3FM Project has greatly benefitted from the environmental monitoring programme which is currently in place for the construction of the ABR Project and the monitoring which has recently commenced for the construction of the MP2 Project.

The combined ABR Project and MP2 Project monitoring programme comprises:

- Continuous noise monitoring at three locations;
- Continuous dust monitoring at two locations;
- Periodic vibration monitoring;
- Continuous water quality monitoring within the inner Liffey channel at four locations (turbidity, dissolved oxygen, temperature, salinity, pH);
- Continuous water quality monitoring within Dublin Bay at four locations (turbidity at three depths) over the period October 2017 to March 2021. This was complemented by continuous wave climate and tidal current measurements;
- Passive Acoustic Monitoring (PAM) for Harbour Porpoise detection at two locations within Dublin Bay over the period October 2017 to March 2021 during the ABR Project capital dredging campaigns, and one location within the inner Liffey channel from July 2022;
- Static Acoustic Monitoring (SAM) for Harbour Porpoise detection at four locations within Dublin Bay over the period October 2017 to March 2021 during the ABR Project capital dredging campaigns, and at three locations from April 2022;
- Records of marine mammal sightings by MMOs during dredging and piling operations;
- Benthic surveys of the licenced dumping at sea site at the entrance to Dublin Bay;
- Monthly seal surveys at Bull Island;
- Lamprey surveys within the Liffey;
- Wintering waterbird surveys within the South Dublin Bay & River Tolka Estuary SPA;
- Tern colony surveys;
- Black guillemot surveys; and
- Underwater noise surveys during piling and dredging activities to validate models used to assess the impact on migratory fish and marine mammals.

The site-specific scientific data collected to date has been used to support the preparation of the EIAR and NIS for the 3FM Project and facilitates a depth of understanding of the environment in and around Dublin Port including the River Liffey channel and Dublin Bay. The scope of the 3FM Project was further considered in the context of the extensive environmental datasets collated during the review of the Dublin Port Masterplan during 2017 and 2018.

Above all, the extensive consultation process undertaken during the review of the Dublin Port Masterplan and the Dublin Port Post 2040 Dialogue Papers and specifically for the 3FM Project, described in Section 3.2, 3.3 and 3.4 above, provided a sound basis for confirming the key issues to be addressed, the extent of the environmental appraisals required, and the level to which these issues needed to be addressed.

In addition to the requirements of the EIA Directive and Irish implementing legislation, the scope of this EIAR, conducted in respect of the 3FM Project, has had due regard to the following documents, amongst others:

- European Commission Environmental Impact Assessment of Project Guidance on Scoping (Directive 2011/92/EU as amended by 2014/52/EU), 2017
- Guidelines on the information to be contained in Environmental Impact Assessment Reports (May 2022), Environmental Protection Agency
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018
- Dublin City Development Plan 2022-2028.
- The Habitats Directive
- The Water Framework Directive
- The Birds Directive
- The Maritime Area Planning Act 2021

### 3.5.2 Extent of Environmental Appraisals

The scoping process identified that no environmental topics under Article 3(1) of the EIA Directive could be scoped-out.

The Environmental Appraisals were therefore designed to address the following environmental factors in order to appropriately identify, describe and assess the likely significant effects which could potentially impact upon them as a result of the implementation of the 3FM Project:

- Biodiversity, flora and fauna;
- Land, soils, geology and hydrogeology;
- Water quality and flood risk;
- Air;
- Climate;
- Noise and vibration;
- Material assets - coastal processes;
- Material assets - traffic and transportation;
- Material assets - services
- Archaeology and cultural heritage;
- Landscape and visual;
- Population and human health; and

- Waste.

The key issues identified through the comprehensive consultation process, described in Sections 3.2 to 3.4, informed a series of specialist studies which were undertaken to enable the prediction of the likely environmental impacts arising from the 3FM Project and to specifically address the concerns raised during the consultation process.

The key specialist studies undertaken and sign-posts to where they can be found in the EIAR are presented in Table 3.12.

Table 3.12 Key specialist studies undertaken during the preparation of the EIAR

Specialist Study / Baseline Survey	Comment	Sign-Post to Relevant Chapter
Coastal Process Modelling	Appraisal of the existing coastal processes and predicted changes resulting from the 3FM Project and climate change - Tidal Currents / Waves / Sediment Movement / Extreme Storm Events / Dispersal of thermal plumes / Dispersal of sediment plumes.  Provision of input data to Water Quality and Flood Risk Assessment (Chapter 9)  Provision of input data to Biodiversity, Flora & Fauna (Chapter 7)	Chapter 13 Material Assets - Coastal Processes
Navigation Simulations	Appraisal of vessel manoeuvring at the proposed Turning Circle in terms of Navigation Safety / Risk of collision with Tern Colonies	Chapter 5 Project Description (Technical Appendix)
Traffic Flow Modelling	Appraisal of traffic flows generated by the 3FM Project - Input to design of roads and road junctions / assessment of potential tail-backs including the Dublin Tunnel / input data for Terrestrial Noise and Air Quality studies	Chapter 14 Material Assets - Traffic and Transportation
Air Quality Modelling	Appraisal of air quality on human and ecological receptors	Chapter 10 Air Quality
Terrestrial Noise Modelling	Appraisal of Terrestrial Noise at the closest sensitive receptors	Chapter 12.1 Terrestrial Noise and Vibration
Underwater Noise Modelling	Appraisal of Underwater Noise (impact on marine mammals and fish)	Chapter 12.2 Underwater Noise
COMAH Land Use Planning Assessment	Appraisal of individual and society risk factors	Chapter 6 Risks of Major Accidents and Disasters
Carbon Calculations	Appraisal of Carbon Usage (construction and operational phases)	Chapter 11 Climate

The specialist studies undertaken during the preparation of the EIAR, together with extensive baseline surveys which included relevant information obtained from the ABR Project and MP2 Project monitoring programmes, and information received from statutory and non-statutory bodies, enabled the potential impacts to be evaluated in terms of their significance, nature and magnitude.

### 3.5.3 Conclusions on Scoping

Through the scoping process which has been carried out in the preparation of this EIAR, the issues which are likely to be important during the environmental impact assessment have been identified. The scoping process has identified the sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors, which are likely to be affected, and has defined the appropriate level of detail for the information to be provided in the EIAR.

All environmental topics have been comprehensively addressed within the EIAR.