

Environmental Impact Assessment Report

Appendix 3.2

Volume 3 Part 1



Report on Consultation process 2021 to 2023



The 3FM Project is the third and final project to be brought forward from the Dublin Port Masterplan 2012 (reviewed 2018). The 3FM Project concerns the development of additional port capacity in the south port area on the Poolbeg Peninsula, which contains nearly 20% of the overall Dublin Port estate.



Dublin Port Company (DPC) has already secured planning permission for two existing Masterplan Projects – the Alexandra Basin Redevelopment (ABR) Project in 2014 and the Masterplan 2 (MP2) Project in 2020.

The initial concepts included in the 3FM Project have been previously indicated in the Dublin Port Masterplan 2012, which was reviewed in 2018. Both the initial Masterplan and the subsequent review involved extensive consultation and engagement processes, including conducting a Strategic Environmental Assessment of the Plan and Review.

DPC commenced concept design work around 3FM in late 2020 and engaged with various stakeholders in the early stages of the design evolution of the project, including;



Initial consultees Q1 2021

DPC sought its first pre-application meeting with An Bord Pleanála (ABP) in May 2021 when the draft General Arrangement of the 3FM Project was outlined to ABP as part of the pre-application statutory processes.

Following the initial meeting with ABP, DPC undertook further bilateral consultations with relevant statutory stakeholders, community groups and organisations with a view to producing a General Arrangement for public consultation.

First consultation process November/ December 2021

In November and December 2021, DPC undertook an initial public consultation process, when details of the 3FM Project were set out for public review and feedback.



This initial consultation process, which took place at a time when public health restrictions concerning COVID 19 were still in place, was based primarily around an online portal, which set out the evolving details of the Project through a Virtual Consultation Room (VCR) which provided information on;

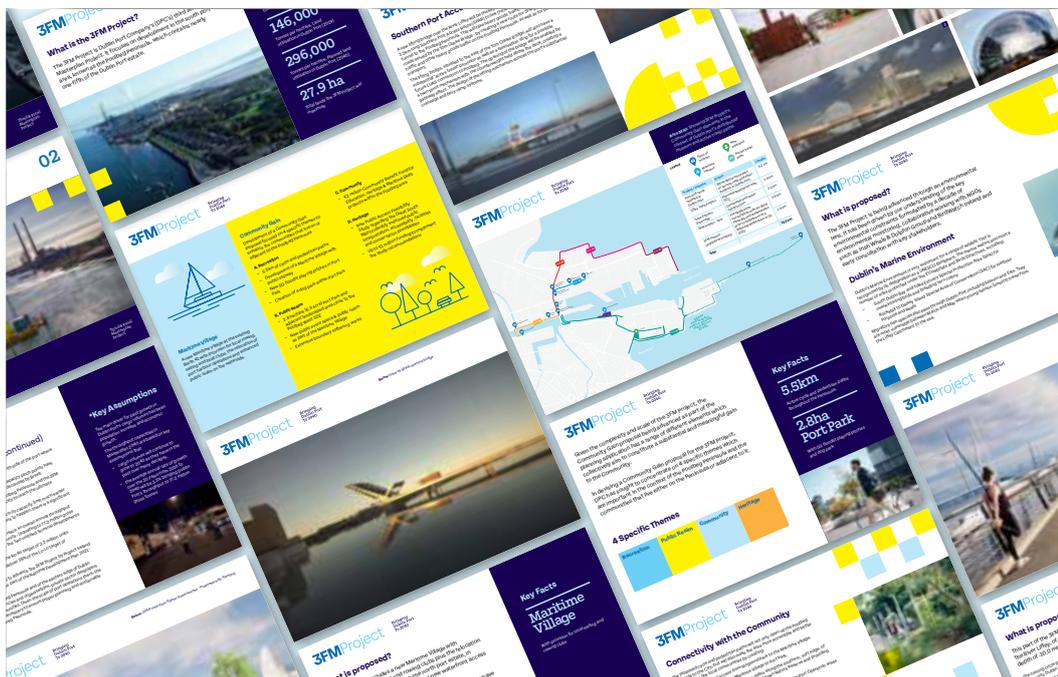
Contents of Virtual Consultation Room

- 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 (SPAR),
 - 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 Virtual Consultation Room also provided information on how the public could submit their views and perspectives on the 3FM proposals, including through the portal itself.

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;

Responses to the First 3FM Consultation Process

Individual visits to the Virtual Consultation Room	5,179 visitors 83% from Ireland 67% from the Dublin area
Submissions received	91 submissions comprised of; 41 detailed submissions 50 feedback forms from the VCR
Follow up meetings arranged (via Teams/ Zoom)	TDs (North Central, Dublin Bay South, Dublin Bay North) & Councillors (Central, North Central & South East) Local stakeholders (RCSF, SAMRA, River clubs, Dublin Bay Watch, Clontarf Residents Association, Clontarf Y&BC) Docklands Consultative & Oversight Forum
Port Boat Trips / Site Visits	Representatives from a range of community, business and environmental groups



Details from the 3FM Project Virtual Consultation Room (VCR).

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 included;

Issues raised during First 3FM Consultation Process

Considerable interest in the project from community groups, individuals, river users and statutory entities.

Broad welcome for early consultation and recognition that the project was at an early stage.

Some queries about the specifics of what is proposed – looking for levels of detail that were not yet available;

- Bridge design and functionality (e.g.; Will SPAR be an opening bridge?).
- Extent of Rail connectivity.
- Visual impact.
- Would a tunnel be better than a bridge.
- Measures intended to address flood risk.

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:

- ESB (consistency with ESB Projects/ supportive of SPAR).
- TII (Traffic impacts on M50 and Dublin Tunnel/ design of SPAR).
- DCC (Soft values/SPAR/Heritage and community aspects).

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.

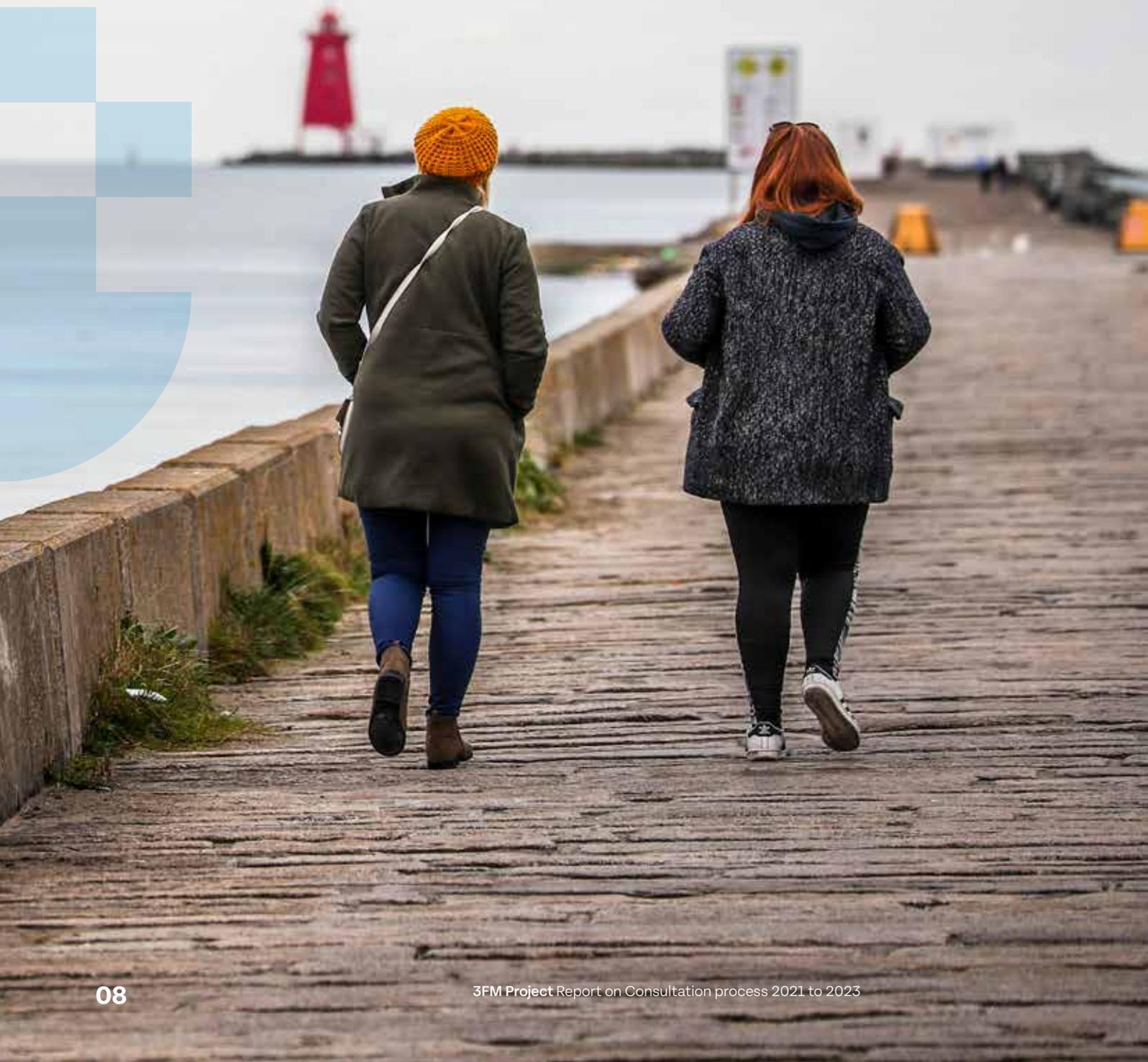
Strong support for the creation of enhanced public marina access and improved access to the River for the local community and clubs.

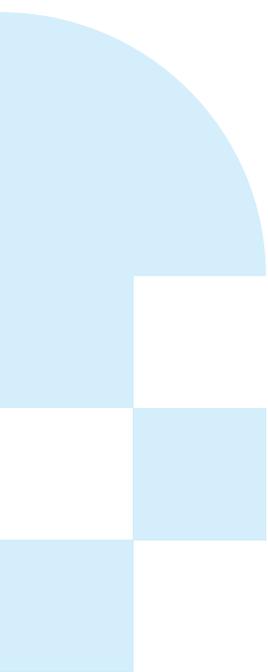
Welcome for no return to 21 ha project.

Keen interest in the project and a real appetite for ongoing consultation and engagement.

Response of DPC to the first 3FM Project consultation process and stakeholder feedback

The benefit of the early-stage public consultation about the 3FM Project has been to help inform DPC's thinking and approach to certain aspects of the project design.





Public consultation matters to DPC and informed both the Masterplan, the ABR and MP2 Projects and the current application. 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 has also emphasised specific concerns and issues that DPC will need 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 with the following refinements to the initial proposals;

Refinements to 3FM Project resulting from First Consultation Process

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.

The SPAR will be 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;

- New cycle and pedestrian paths
- New Port Park with playing pitches and dog park
- €2m Community Benefit Fund for Education, Heritage and Maritime Skills Projects within the Poolbeg Area
- New Public Access Feasibility Study for the Great South Wall and €1m funding to implement study recommendations.

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.

Second public consultation process

March – May 2023

The second public consultation process for the 3FM Project was initiated on 21 March 2023 and continued until 15th May 2023. Unlike the first consultation process, which had been conducted during the COVID-19 pandemic, this process 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 to allow for effective engagement and an understanding of the key elements of the project.

The Virtual Consultation Room 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 second public consultation processes attracted considerable participation and feedback.

Details of participation in Second Consultation Process

Individual visits to the Virtual Consultation Room	9,795 visitors (up from 5,179 in the first process) 84% from Ireland 80% from the Dublin area
Detailed submissions received	145 written submissions 39 of which were largely identical and based on a template
Public Information Days;	Attracted over 200 visitors across 3 centres
Port Boat Trips / Site Visits	A number of groups and individuals were brought on boat trips and tours of the Port Estate
Follow up meetings arranged (via Teams/ Zoom)	Several bilateral meetings organised with Community Groups, public representatives and organisations, including: The Docklands Consultative Forum The Docklands Business Forum Samra

The second public consultation process attracted considerable interest 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
- Non-Governmental and charitable Organisations

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 below;

Observation

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 3FM 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 fields and active travel routes.

The proposal to construct the Southern Port Access Route as a public road was welcomed.

Second public consultation process March – May 2023 continued

There was also feedback which raised questions or concerns about aspects of the 3FM Project.

The key elements of such feedback are set out below together with an initial response by DPC to the relevant point made;

Observation	DPC comment
<p>The 3FM Project must comply with national policies on climate action, the circular economy, housing, and biodiversity.</p>	<p>DPC is deeply conscious of the responsibility and requirement to ensure 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.</p> <p>Additionally, DPC notes the strong policy support for 3FM in the National Planning Framework, the National Development Plan, National Ports Policy, the Regional Spatial and Economic Strategy and the Dublin City Development Plan.</p>
<p>The 3FM Project places continued reliance on unsustainable modes of maritime trade and logistics.</p>	<p>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.</p>
<p>The growth assumptions on which the 3FM Project is based are excessive and do not justify a project of this scale and nature.</p>	<p>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.</p> <p>In particular, DPC is keenly aware that in order to get planning permission from An Bord Pleanála 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 it can be delivered in accordance with proper planning and sustainable development.</p>

Observation	DPC comment
<p>The 3FM Project needs to embrace rail freight.</p>	<p>Dublin Port is rail connected and the areas to be developed as part of 3FM will be rail enabled.</p> <p>Dublin Port has been an active supporter of rail freight for many decades. Ireland did have a significant rail freight network in the 1990s, with rail heads and hubs throughout the country, but this was dismantled by Irish Rail due to low market demand. Over the same period, DPC maintained its investment in rail, spending €1.2 million to build a dedicated rail spur to Ocean Pier which opened in 2011 and has been maintained ever since.</p> <p>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 Port Tunnel offers a highly competitive and effective alternative.</p> <p>DPC has advanced proposals to Irish Rail to increase rail access to Dublin Port, specifically by developing Irish Rail'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.</p> <p>Ultimately, it will be a matter for Irish Rail to develop a detailed and costed business case for investment in rail freight which addresses market demand, commercial viability, compliance with State Aid rules and environmental impact.</p>
<p>Rail is a means of decarbonising freight and should form a far greater part of the 3FM Project.</p>	<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 (Tara Mines). 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 could even be suitable for rail freight. Developing the rail freight network would also require significant additional construction over a considerable period of time which will generate additional embedded carbon.</p> <p>Any such developments should also be viewed against improvements in the sustainability of road based transport due to new technologies and fuel mixes leading to significantly reduced emissions.</p> <p>Doubtless these are matters that will be addressed in the All Island Strategic Rail Review.</p> <p>The most effective short-term way of decarbonising freight is to ensure that low emissions HGVs are encouraged onto the national road network.</p>

Observation	DPC comment																
<p>Parts of the 3FM Project area should be used for recreation and amenity purposes, including a nature reserve, rather than commercial purposes.</p>	<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>																
<p>There are no capacity constraints in Dublin Port and the Port could operate more efficiently within its existing developed sites.</p>	<p>Dublin Port is already an exceptionally efficient port.</p> <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 & 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="475 1384 1182 1693"> <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>65m</td> <td>1,082ha</td> <td>60,000</td> </tr> <tr> <td>Rotterdam</td> <td>468m</td> <td>7,833ha</td> <td>59,000</td> </tr> <tr> <td>Dublin</td> <td>34.9m</td> <td>309ha</td> <td>112,000</td> </tr> </tbody> </table> <p>DPC's demand / capacity plans already factor in ongoing efficiency increases across the supply chain.</p>	Port	Tonnes 2021	Land Area	Tonnes per ha	Barcelona	65m	1,082ha	60,000	Rotterdam	468m	7,833ha	59,000	Dublin	34.9m	309ha	112,000
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<p>The SPAR should be a public road, which caters for public transport.</p>	<p>The SPAR will be a public road which will cater for Port traffic, heavy commercial traffic serving other facilities on the Poolbeg Peninsula, Public Transport and blue light services.</p>																

Observation	DPC comment
<p>The 3FM Project could have an adverse impact on flora, birds and other fauna.</p>	<p>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. DPC is acutely aware that in order to secure planning consent for the 3FM Project it will be necessary to demonstrate to An Bord Pleanála that the project does not adversely impact on the natural environment as protected by EU and national law.</p>
<p>Dublin Port should relocate to another unspecified location on the East Coast and the land be developed for housing.</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 2023. 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 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>

Observation	DPC comment
<p>Area O should not be used for container storage and should be used for parkland, amenity and nature.</p>	<p>Area O is required to service imports arriving in Lo-Lo 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>The 3FM Project will need to take account of all other developments in Dublin Bay.</p>	<p>As a core part of the planning application to An Bord Pleanála, DPC will be obliged to provide an assessment of the 3FM Project in combination with all other relevant projects.</p>
<p>The 3FM Project will bring additional noise, traffic and pollution as well as an eyesore.</p>	<p>DPC will need to establish for An Bord Pleanála, that the 3FM Project is in the interests of proper planning and sustainable development in order to secure planning permission. A key part of establishing this will be to 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 to prove this to ABP. The research to date indicates that the project will, in fact, make significant improvements in noise, traffic, and reduced pollution.</p>
<p>The impact of 3FM on the adjoining road network (including the Dublin Tunnel) needs to be carefully assessed.</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>

Observation	DPC comment
<p>The SPAR should facilitate the expansion of the LUAS into the Poolbeg Peninsula.</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 was the NTA's final chosen Luas alignment.</p>
<p>Will rising sea levels be factored into the 3FM Project?</p>	<p>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.</p>
<p>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.</p>	<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>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?</p>	<p>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.</p>
<p>Wind turbines should be included as part of the project within the Port Estate</p>	<p>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.</p>
<p>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.</p>	<p>3FM will not lead to a 75% increase in traffic on the M50. Equally the project will not increase congestion in the 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.</p>

Observation	DPC comment
<p>Dublin Port should follow the European example of moving out of the City and to a new greenfield site.</p>	<p>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.</p>
<p>Rosslare should be an effective substitute for Dublin Port.</p>	<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, and 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. Any future marine infrastructure development in Rosslare will be expensive (particularly if breakwaters are required - as is most likely if Lo-Lo operations are to be considered), and pose significant permitting challenges given its location amidst a cluster of Natura2000 sites.</p> <p>In terms of location, Rosslare Europort is located 155km from Dublin. Assuming berth and land capacity can be secured, a major investment in the 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>Why bother with the 3FM Project if Dublin Port is going to reach capacity by 2040?</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 some <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>

Observation	DPC comment
<p>Dublin Port has no regard for Climate Action or reducing carbon emissions.</p>	<p>DPC's plans are fully aligned with Climate Action goals. Dublin Port is keenly aware of the need to meet the targets set out in the Climate Action Plan and will have to demonstrate this to An Bord Pleanála. Separately and through targeted initiatives DPC is working to reduce its carbon emissions - through low carbon fuel options for vehicles, electricity services for ship to shore power, facilitating the connection of Offshore Renewable Energy to the national grid as well as facilitating efficient rail connectivity.</p>
<p>Dublin Port lands are ideal for housing.</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 where facilities include, Electricity Generation Stations, Waste Water Treatment Plants, a Cement Factory, Strategic Oil Storage Tanks, Bitumen and Molasses storage facilities and a Waste to Energy plant. The area is also traversed with the infrastructure required to service these facilities, including HV power cables 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. It is also important to bear in mind that Dublin Port does play a vital role in the provision of housing, given that so many of the component elements required for Ireland's construction sector come through the Port.</p>

DPC welcomes and is very appreciative for the high level of engagement generated during both the first and second consultation processes.

DPC will further reflect on the feedback received and will seek to refine the 3FM Proposal in light of the concerns, expectations and requirements brought forward during the consultation.

In particular, when lodging a planning application with An Bord Pleanála for the 3FM Project, DPC is acutely aware that the application will need to demonstrate to ABP and to other stakeholders, that the 3FM Project is in the interests of proper planning and sustainable development and complies with all relevant EU, National, Regional and Local policies.

In addition to the consultation processes undertaken to date, DPC will continue to engage with all relevant stakeholders as the preparation of the 3FM Project for planning continues.

Additionally, it is planned to undertake a major public information exercise to inform all stakeholders of the proposed development when the planning application is lodged with An Bord Pleanála late this year.



The purpose of this information exercise will be to inform people 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.

The public information will be imparted on an objective basis to encourage the maximum possible public participation in the planning assessment process and (as required by An Bord Pleanála) will include;

- Submission of the application and accompanying documentation to the relevant statutory stakeholders.
- The planning application and related materials being posted to a dedicated website independent of the main DPC website.
- The planning application and associated documentation being made available at the offices of DPC, the offices of DCC and ABP and available in CD Rom for members of the public on request.
- A public information campaign including;
 - Public notices
 - Advertisements
 - Public information sessions in local community centres
 - A newsletter circulated to local residents
 - A mailshot to public representatives and local community/residents/social and environmental groups
- A media information campaign including national and local media through multiple formats.

The development proposals advanced in the 3FM Project reflect the significant levels of consultation that have taken place since 2011 on the future of Dublin Port. This has occurred through the development and review of the Masterplan and as a consequence of three Strategic Infrastructure Developments.

The specific issues raised during the consultation process on the 3FM Project will be specifically addressed in the planning application and associated assessments and reports.



The various submissions and comments made in relation to the proposed development will be fully considered by expert consultants in the preparation of the Environmental Impact Assessment Report, the Natura Impact Assessment and by the applicants in the design of the scheme.

Every effort will be made to address all concerns raised and, where possible, mitigation measures will be proposed to minimise the environmental impact of the proposed development.

DPC is deeply appreciative of the effort undertaken by so many people and organisations to participate in the 3FM Consultation processes. All submissions have been read, considered and noted and will be taken into account in the finalisation of the 3FM Project proposals which are brought forward for planning.



3FMProject

Bringing
Dublin Port
To 2040