



Docklands Business Forum's Observation on Dublin Ports MP2 Project

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1. Introduction

The Docklands Business Forum¹ (DBF) is a social enterprise and the business association for the Dublin Docklands and is recognised as the primary business organisation by the Dublin Docklands Area Master Plan². With more than 100 member organisations, representing over 35,000 employees, the DBF is a key stakeholder in the Docklands' area.

The purpose of the DBF is to ensure Docklands realises its full potential by becoming a world centre for international commerce, entrepreneurial innovation and maritime tourism. We offer businesses an opportunity to take part and contribute to a range of activities and initiatives furthering these goals while also using their participation to create valuable networks for their own enterprise.

2. Planning Context

There is an important planning context to this application from the Dublin Port Company. The current Docklands Strategic Development Zone (SDZ) and the smaller Poolbeg SDZ will soon be, in the context of strategic development, built and the city left with few, if any, large areas of land to accommodate its growing population. The wider consequences for the city's sustainability as an inviting urban centre for business and residents are ones we believe An Bord Pleanála need to consider.

Dublin's Docklands is the country's most successful urban regeneration and its fastest growing urban area. Docklands is now producing 9% of Ireland's GDP and has created over 45,000 professional jobs in what was until quite recently an urban wasteland. With containerisation the port activities moved east and have now been replaced by a colourful range of service exporters providing high paid jobs, over 10BN investment and little if any dependency on the heavy transport infrastructure needed by the Dublin Port Company. This new *Services Port* is, we believe, appropriate for such a city centre location.

3. Dublin Port's MP2

The Docklands Business Forum welcomes this opportunity to express a view on the Dublin Port Company's MP2 application. We regret, as the local business representative body, the Dublin Port Company did not reach out to us during the pre-application consultation process so we could have had an input at an earlier stage.

Business has invested over €10 Billion in Dublin's Docklands regeneration and created over 45,000 jobs. We are surprised to find only a small handful of enterprises listed in the pre consultation document and all of those Dublin Port Company clients or utility providers with a presence on the Port campus. Not a single business in the regenerated Docklands appears on the list though some of them individually exceed the total employment figure on the DPC campus.

¹ www.docklandsbusinessforum.ie

² Policy ED13 Page 69

The Docklands Business Forum has a number of concerns in relation to the application and has chosen to express them as questions most appropriately answered in a dialogue that an oral hearing in An Bord Pleanála would facilitate.

Is it in the interests of Dublin that the Port, located in the city centre, doubles its capacity?

It is the stated objective of Dublin City Council 'to promote residential development' and attract residents back into the city centre including families.³ This objective seems incompatible with the strain on the urban infrastructure that the development will cause.

The continued location of the port in the city centre is an unresolved issue for many and for some a controversial one.⁴ 'In the past two decades Barcelona, Bremen, Copenhagen, Amsterdam, Oslo, Bilbao, Buenos Aires, Genoa, London and Cape Town have all moved their ports and liberated the land to create beautiful new cities in which people can work, live and play.'

It seems out of step of international best practice for a port so closely located in the city centre to not only refuse to seriously consider moving to a more appropriate location but to seek, as the Dublin Port Company does with this application, to double its capacity.

Is it in the interests of the country for the Dublin Port Company to be facilitated in maintaining its market dominance?

The MP2 Application to An Bord Pleanála is in the Dublin Port Company's interest. It will protect the company's dominance in the export market. The DPC's share of national volumes in Ro-Ro2 is 88.7% and in Lo-Lo3 is 72.6%⁵. The company dwarfs all its competitors combined. If a private company possessed such market power there would almost certainly be calls for it to be curtailed or broken up. Whether this dominance is in the interests of the city or the nation is an important question and one that needs to be urgently addressed.

Is the current Port site still fit for purpose?

There is much evidence to suggest it is not.

- In 2016 the DPC needed to purchase 44 hectares of land in the west of the city to facilitate its ongoing activities. This is all the more surprising as DPC's leadership has insisted the company will not move its facilities from Dublin city centre.⁶
- The DPC have had to cut cruise ship visits in half to facilitate the space needed as a result of an unpredicted growth in exports. This is particularly unfortunate as the DPC had themselves initiated and invested heavily in building this cruise business.⁷
- The DPC have acknowledged in their application that the Port will reach its 'ultimate capacity' of '77.2 million gross tons by 2040'. Even after an unprecedented investment of tax

³ QH7 Dublin City Council Development Plan 2016-2022

⁴ The Irish Times, David McWilliams, *Dublin Port is a waste of space. Move it*

⁵ MP2 Project – Planning Report Page 3

⁶ Irish Independent, Dublin Port gets planning approval for latest phase of its inland development, 04/09/19

⁷ The Irish Times, Dublin Port defends decision to restrict cruise ships, 04/09/19

payer money this major strategic infrastructure will have nowhere further to go in just twenty-one years.⁸

Will the heritage piece work?

The Docklands Business Forum welcomes the heritage and community gain elements of the application. We ourselves as far back as 2013 published our policy document on the potential for tourism, particularly maritime based, in the area.⁹ Many businesses have carried out extensive restorations of Docklands industrial heritage including the London and North Western Hotel on North Wall Quay, the CHQ Building on Custom House Quay, the Tropical Fruit Warehouse on Sir John Rogerson's Quay and the Victorian warehouse at Grand Canal Quay to name a few.

We are concerned that such a heavy investment in the Heritage zone may not receive the footfall appropriate to success as a result of its location deep inside the working port campus. Epic – The Irish Emigration Museum has for long years struggled to realise the success it has achieved to date. And this attraction is located close to the traditional city centre, is on the Luas line and five minutes from the DART at Connelly Station. It is located in the beautifully restored CHQ Building and surrounded by bars, cafes and restaurants. It will be extremely difficult for the Dublin Port Company to attract footfall to facilities that have none of the above advantages.

Examples the DPC have cited in the application are located more appropriately in populated areas and established recreation zones.¹⁰ By way of demonstration the cited examples of the Sea Wave Organ in San Francisco is located at the Golden Gate National Recreation Area, a popular amenity in its own right and the Sea Organ in Zadar is located on the promenade adjacent to the centre of the town.

Is there sufficient infrastructure outside the Dublin Port Company to deliver the increased capacity?

The Port Tunnel has now reached a capacity that cannot be increased. Frequent delays are experienced by hauliers, in some cases up to six hours. This is not only a problem for those seeking entrance and exit from the Port but also for others needing to use the city's roads.

There will be a significant negative impact on the surrounding road network caused by a doubling of capacity of the Dublin Port Company's city centre campus adversely affecting the lives of those that live and work in the area.

Should the Dublin Port Company seek joint ventures with other Ports?

As acknowledge by the Department of Transport, Tourism and Sport's own research there is unused capacity in other ports around the country.¹¹

⁸ MP2 Project – EIAR Non-Technical Summary Page 3

⁹ <http://bit.ly/2vHrnaY>

¹⁰ MP2 Project, Industrial Heritage Impacts & Compensation Planning & Design Report

¹¹ National Ports Policy, Department of Transport Tourism & Sport

Would it not be better for the Dublin Port Company to seek joint ventures with other ports?

- Rosslare Port has significant untapped capacity.
- Journey time from Dublin has greatly improved with recent motorway construction.
- Rosslare could deliver the increased capacity Dublin Port requires for a fraction of the cost and take much of its Ro-Ro volume.
- Dublin Port could then concentrate more of its space on Cruise and Ferry terminals that would add greater value to the Dublin city centre economy without causing as much road disruption.
- This initiative will help build Ireland's over all export capacity in preparation for the Dublin Port Company reaching its limit in 2040.
- In the context of Brexit, Rosslare Port has significantly less travel time to the continental market.

Conclusion

As stated in the introduction to this paper the regeneration of Dublin's Docklands has been the nation's most successful urban regeneration. €10 Billion invested has delivered well paid and sustainable jobs for Dublin's inner city. Docklands is now identified by Fáilte Ireland as a tourist growth zone. Dublin City Council has planned a water animation strategy for the River Liffey and surrounding canal network. Thus the future potential of the area has even more to deliver.

We are concerned the doubling of the Dublin Port Company's capacity with the associated industrial activity and related strain on the transportation infrastructure will adversely impact both established success and future potential.