

NFP Submissions
Forward Planning Section
Department of Housing, Planning, Community
and Local Government
Custom House
Dublin 1

9th November 2017

Re: Submission to the Draft National Planning Framework, Ireland 2040: Our Plan, on behalf of Doyle Shipping Group

A Chara,

Doyle Shipping Group (DSG) welcome the publication of the draft National Planning Framework and the opportunity to participate in the plan making process. On behalf of DSG, McCutcheon Halley Chartered Planning Consultants previously submitted comments (see Appendix 1) to the Department of Housing, Planning, Community and Local Government on the Pre-Draft Consultation Phase of the National Planning Framework (NPF), *Ireland 2040: Our Plan*. The submission focused primarily on Greenore Port, a privately-owned commercial port in Co. Louth.

The stated overarching objective of the NPF is to provide a long-term strategic planning framework to guide national, regional and local planning and investment decisions. The life term of the NPF is 25 years so undoubtedly it will have to guide decision making through various economic cycles and their various impacts. It is thus critical that the NPF is a dynamic framework, capable of adapting to change in the future.

We welcome, the recognition of the shared aims and overlapping areas of coordination and activity between land-use and maritime planning. It is recommended that this acknowledgement is strengthened through the inclusion of a National Policy Objective to align the various consenting processes (planning, foreshore, dumping at sea etc.). Such an objective would make the development consenting process more efficient, provide certainty for investors and allow the industry to respond in a timely manner to opportunities and challenges thereby making the national economy more resilient.

Section 6.3 of the draft NPF gives primacy to those ports listed as Tier 1 and Tier 2 in the National Ports Policy (NPP). As highlighted in our previous submission Greenore Port is identified as a port of regional significance within the NPP and these ports are described as *“limited in their future potential as centres of commercial shipping”*.

Greenore is currently handling larger vessels compared to other ports of regional significance. In comparison with some of the listed Tier 2 ports, e.g. Bellview Waterford (specifically mentioned in the draft NPF), Greenore has superior infrastructure available, such as stevedoring facilities. Although Greenore Port is not handling tonnages similar to Waterford, the port has the capacity to handle bigger ships compared to the 190m vessels that Waterford can handle.

Greenore Port is unique, in that it is Ireland's only privately owned commercial port and the NPP only applies to ports under the control of the Department of Transport, Tourism and Sport. The draft NPF gives no

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recognition to privately owned ports and this omission may serve to unintentionally restrict the development of Greenore in the future.

It is regrettable that the draft NPF does not identify Greenore Port in the same way it does Bellview and Europort, as a port with potential for growth and expansion. Greenore offers a suite of attributes including deep-water, a significant quantum of undeveloped land, the closest port to one of the State's key trading partners (the UK) and within easy reach of the M1 Dublin-Belfast corridor. Greenore thus offers characteristics that if recognised and supported would contribute well beyond its immediate environs.

In a broader context, in the recent past, the Government considered privatising ports in response to the economic crisis; while in the UK, virtually all ports are in private ownership. Given the proposed life-term of the NPF (25 years), it will undoubtedly act as the guiding national planning framework through different economic cycles and needs to be robust enough to deal with the impacts these might have on the State. It is not inconceivable that some form of privatisation in the ports sector could occur in the future. This coupled with the existence of a privately owned commercial port, Greenore Port, within the State, means that some form of recognition of the private sector must be provided for within the NPF, to future proof it in terms of adaptability.

As an island nation, ports are a key infrastructural requirement for the economy. It is regrettable that the draft NPF does not explicitly reference the well documented challenges currently being experienced by Dublin Port including capacity issues (landside), berthage depth, encroachment of the city and ecological issues. It is not unthinkable that the east coast will need a 'new port' over the lifetime of this plan and it would thus be desirable that the NPF include an infrastructure objective to this effect.

Greenore Port is the only deep-water port on the east coast outside of Dublin Port. It has the required natural features and is ideally located to act as a counter magnet to Dublin Port and would not require State investment for the construction of a new port as has been suggested in the recent past.

In summary, it is noteworthy that the policies contained within the NPP only apply to semi-state ports and not to privately-owned ports. It is critical that forthcoming National planning policy does not isolate the growth of port infrastructure simply because it is a private and not a public entity. The NPF will remain in force for the next 25 years and must promote positive planning policies for both public and private bodies.

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Paula Galvin

McCutcheon Halley Chartered Planning Consultants