

NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community
& Local Government
Custom House
Dublin 1

31 March 2017

Re: Submission to Ireland 2040: Our Plan – National Planning Framework: Issues and Choices on behalf of Doyle Shipping Group

A Chara,

Doyle Shipping Group (DSG) welcomes the opportunity to comment on the first stage of the process for drafting a National Planning Framework (NPF), the Issues and Choices Paper published in February 2017.

Founded in 1886, DSG are a family owned company providing shipping and maritime support services to a wide range of industries. The company, employs 500 people and has offices and warehouses in Dublin, Foynes, Cork and Belfast and operates two private port facilities: Greenore Port in Co. Louth and Cork Dockyard in Cobh, Co. Cork.

Context

Ireland's ports and shipping services play an important role as enablers of economic growth. They are a vital contributor to the State's economic recovery and success. It is estimated that the sector employs 7,200 people directly in maritime transport related activity. Ireland's maritime industry grew strongly in 2015. The iShip Index, which measures the total volume of traffic moving through the State's ports, recorded a 7% increase, with all major traffic modes delivering substantial growth. Bulk traffic grew by 7% to reach 29.8 million tonnes, with Cork, Greenore, Foynes and Waterford recording above average growth rates. This growth reflects both improved export performance and increased consumption in the domestic economy.

With the abolition of milk quotas early in 2015, agricultural output is generating spin-off opportunities for regional ports to capitalise on increased agricultural output, as evidenced by the decision of Glanbia plc to invest €157 million in a major new dairy facility near Waterford Port.

Because of the volume gains recorded in recent years and in anticipation of future growth, Doyle Shipping Group are preparing to add capacity to their existing infrastructure. It is against this background that DSG are motivated to respond to this consultation process. It is critical that the forthcoming NPF provide suitable guidance to decision makers on the economic impacts of port infrastructure. The importance of ports and their role in national, regional and local economies must be highlighted in the forthcoming NPF and the wider societal benefits that can be achieved from port development must be embraced in spatial planning.

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DSG welcome and are encouraged by the inclusion of dedicated sections to *Ireland in an All-Island Context*, *Opportunities for our Regions* and *Integrated Land and Marine* sections in the Issues and Choices Paper. In this regard, DSG wish to draw attention to Greenore Port, which is privately owned and offers a host of opportunities to support the objectives of the forthcoming NPF.

Greenore Port

DSG acquired Greenore Port in 2014. The port was previously jointly owned by One51 and the state-owned Dublin Port Company. Greenore Port's potential has been recognised by An Bord Pleanála, which has described it as one of Ireland's "*critical infrastructure assets*."

The Port has a long history, being operational for the past 140 years. In 1963, the port became the first port in the Republic of Ireland to handle containerised traffic and then during the 1980s when container traffic started to move to the larger developing ports of Dublin and Cork, the Port began handling large volumes of bulk cargoes as well as playing a vital role in the export of live cattle and frozen beef to the Middle East during the 1980s and 1990s.

Today, Greenore Port is Ireland's only privately owned commercial port, comprising c.57 acres of land. It has approximately 275m of quayside space comprising two berths which can cater for vessels with a draft of 8.5m. It has pilotage, tugboats and communications available with several large warehouses at the facility including one dedicated to the ocean energy company OpenHydro Ltd.

Infrastructure development is required to extend the existing quay and provide better facilities at the port. There is vast potential to further develop the port's estate and DSG are committed to investment. Since acquiring the port in 2014, over €4 million has been invested in warehousing, offices, craneage, dredging and storage areas. DSG expect to invest up to €15 million in the port up to 2020.

However, to achieve this projected investment, robust policy must be in place and we respectfully request that the forthcoming NPF strongly advocate the use of existing port infrastructure for expansion.

Greenore Port provides marine & logistical support to the following sectors:

- agri-feed
- construction
- renewable energy
- livestock exports
- manufacturing industries

It is the No. 1 Port in Ireland for the import of reinforced steel and the export of livestock. Approximately 80% of the countries reinforced rebar is imported through Greenore Port.

Policy

The National Ports Policy (NPP) (2013) introduces a categorisation of the ports sector into Ports of National Significance (Tier 1 and Tier 2) and Ports of Regional Significance. Greenore Port is categorised as the latter. Ports of Regional Significance are considered within the NPP to function as important facilitators of trade for their regional and local hinterland and this is certainly the case for Greenore Port. However, ports within this category are "*limited in their future potential as centres of commercial shipping*" and this assertion is an impediment in terms of the future growth and development of Greenore Port. This tiered port structure provides uncertainty in terms of planning for Greenore.

It is Doyle Shipping Group's intention to seek an elevation to Tier 2 status in any future NPP, to allow it to make a full contribution to facilitating economic recovery and prosperity. Greenore Port is currently handling much larger vessels compared to other ports of regional significance. In comparison with some of the listed Tier 2 ports, e.g. Rosslare and Waterford, Greenore has superior infrastructure available, such as stevedoring

facilities. In addition, the port which is handling the most tonnage out of the 'ports of regional significance' is Drogheda, the largest vessel they can cater for is approx. 120m in length, while Greenore can accommodate vessels of 200m.

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.

Upon completion of the proposed investment in Greenore Port, by 2019 the Port will be able to accept vessels of 225m in length and 75,000T deadweight. The only ports in the Republic of Ireland capable of this will be the Tier 1 Ports and Greenore. There is a growing trend in the industry for larger, deep sea, more efficient vessels which provide customers with economies of scale which highlights the significance of deep water ports in the country.

Three criteria are established within the NPP to qualify as a Tier 2 Port and they are:

1. responsible for at least 2.5% of overall tonnage through Irish ports;
2. have the clear, demonstrable potential to handle higher volumes of unitised traffic, and
3. have the existing transport links to serve a wider, national marketplace beyond their immediate region.

In 2015, Greenore Port handled c.1.5% of the State's overall tonnage. Since acquiring the company DSG have increased the throughput at the port by over 25% and DSG plans to invest further to increase the throughput. It is envisaged that owing to its strategic location, quantum of undeveloped land and deep water, these criteria will be met at Greenore.

Strategic Location

The port is strategically located roughly mid-way between Dublin and Belfast at the entrance to Carlingford Lough on the eastern end of the Cooley Peninsula and is connected to the M1 motorway by 15km of uncongested R175 regional route, making the Port one of the one most easily accessible ports in the Country.

Greenore is thus strategically located next to the Dublin-Belfast economic corridor, so it is capable of servicing both cities. This corridor, which also serves Dundalk and Newry, is the most significant economic region on the island of Ireland.

The Dublin-Belfast Corridor has been identified as a core axis. Reports undertaken by public bodies and business organisations, both North and South, have identified the potential spin-off in terms of growth, revenue generated and employment created from enhanced business and commerce links.

If borders are to cease being barriers to integration in land-use planning terms, then an integrated approach to strategic planning is required.

The implications of Brexit are yet unknown, however, if the UK is to lose its free trade status within the EU, the resulting customs clearance and tariffs will make the movement of goods from Northern Ireland (NI) to the Republic of Ireland (RoI) less competitive. Greenore Port is ideally placed c.15kms from the border to accept goods currently imported to NI.

The forthcoming NPF should explicitly reference strategic corridors and promote port related facilities with key infrastructural connections.

Ireland's National Planning Challenges

The population of Ireland is now 4.75 million and the number in employment exceed 2 million. There has been an ever-increasing concentration of population and economic activity along the eastern seaboard.

The Issues and Choices paper forecasts that the population of Ireland will increase by at least 750,000 people by 2040. It is also envisaging that there will be a need for an absolute minimum of 500,000 new homes within the period of the Framework. The availability of appropriate property solutions for attracting employment, particularly in the Dublin market is also at a pinch point.

Ireland needs a high quality, efficiently delivered, built environment catering to an advanced society and an economy competing globally.

Adequate port infrastructure is a critical part of the supply chain to ensure the efficient delivery of residential and commercial infrastructure. In this regard, Greenore is the No.1 port on the island of Ireland for the importation of steel reinforced bar and is a key location for bringing in gypsum rock, two critical materials required in construction.

The inter-relationship between ports and construction industries should be emphasised in the forthcoming NPF, to assist with a wider understanding of the need to ensure sufficient port capacity to underpin the construction sector.

Opportunities for our Regions

Dublin Port is facing several well documented challenges including capacity issues (landside) berthage depth, encroachment of the city and ecological issues.

Greenore Port is the only deep-water port on the east coast outside of Dublin Port. It is located c.100km north of Dublin with direct access via the M1 Motorway and Port Tunnel. It has the required natural features and is ideally located to service both the overspill and unwanted goods from Dublin Port and would not require the level of investment required for the construction of a new port as has been suggested in the recent past.

The forthcoming NPF should explicitly reference the capacity issues arising at our National Ports and promote the expansion of existing ports which have good transportation links as an efficient land use.

Supporting the Potential of Rural Ireland

Figures for 2015 demonstrate that feed use on grassland enterprises in Ireland increased considerably in volume terms. This can be largely explained by the increase in feed use on dairy farms, driven by the growth in dairy cow's numbers associated with milk quota removal. Based on Department of Agriculture, Food and the Marine (DAFM) and Central Statistics Office (CSO) data, dairy feed use per head in 2015 was approximately 930 kg per cow, an increase of 8% on the previous year.

Approximately 4.3 million tonnes of animal feedstuff is consumed in Ireland annually. Of this approximately 65% or 2.8 million tonnes is imported. The current level of demand for feed imports is projected to increase significantly if the targets for increased output from the livestock sector are to be realised.

Much of the feedstuff for the north-eastern market is imported through Warrenpoint Port in NI, due to a deficit in quayside storage facilities in Greenore. Thus, RoI is losing out on taxes e.g. import duties to the UK Government which is contrary to objectives contained in the National Ports Policy.

In addition, a HGV road user levy is enforced for trucks weighing more than 12 tonnes moving between NI and the RoI. As an overhead, the payment of £10 per day is incorporated into the cost of animal feedstuffs sourced in Warrenpoint which ultimately increases the cost to the consumer in RoI.

Food Wise 2025 published in 2015 is a growth vision for the Irish agricultural economy and contains 4 headline opportunities:

- increase the value of agri food exports by 85% to €19 billion;
- increase value added to the sector by 70% to €13 billion;
- increase the value of primary production by 65% to €10 billion; and

- in turn, achieving these targets is expected to deliver a further 23,000 jobs in the agri food sector by 2025.

These growth opportunities are forecasted as arising mainly from three changes in the economic environment for the agri-food sector, namely the abolition of milk quotas, strong demand for protein (livestock products and seafood) arising from growing economic prosperity in emerging markets and Africa, and more differentiated consumer demand opening high value added opportunities in consumer markets. Within tillage, the prospects for growth suggest a switch from commodity animal feed grade production to premium production such as malt barley, milling wheat, breakfast cereal production and health food. To meet the fiscal targets set-out in Food Wise 2025 increased volumes of imported animal feedstuff will be required to meet demands of the livestock and dairy sector and Greenore Port is putting plans in place to support the delivery of these targets.

The forthcoming NPF should recognise the pivotal role that ports located in rural areas can play in supporting the agricultural sector and the State in achieving its growth objectives.

Renewable Energy

Section 4.5.11 of the Issues and Choices Paper references the need to seize new opportunities in the marine sector such as those in the learning economy and the energy sector to deliver sustainable economic growth, attracting and retaining population and supporting services.

In this regard, Greenore Port is the location for OpenHydro, a company whose goal is to be the leader in tidal solutions, delivering economic marine renewable energy, with a target of €1 billion in revenues in 2026. OpenHydro undertakes research and development and manufacturing at its Greenore Port base and have built a leading business in an emerging industry.

More recently, wood chip is imported through Greenore to support Bord na Mona's transition from peat generated energy to green energy at Edenderry Power Plant and it is expected that the volumes will increase in the future.

Greenore Port plan to upgrade its infrastructure over the coming years and expand its present facilities. Greenore Port is ideally placed to have a future role in the renewable energy sector particularly if plans for planned upgrades materialise. Future development and expansion of the port with more extensive land banks could offer better facilities and support to service the marine renewable energy industry.

Conclusion

We respectfully request that the Department consider the points outlined above and suggest that the forthcoming NPF should give full prominence to the importance of sustainable development, while also stressing the national need for developers' commercial judgements to be respected in what continues to be a successful, market-oriented and responsible sector.

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Paula Galvin

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