



Executive Summary & Context

Balbriggan Community Council (BCC) welcomes the opportunity to submit its formal response regarding the proposed Bremore Regional Port project. As a statutory stakeholder representing the closest major urban centre and community to the proposed site, BCC must explicitly contextualise this development within its broader regional impact.

While acknowledging national strategic priorities for expanding **Offshore Renewable Energy (ORE)** capacity and port infrastructure to accommodate next-generation deepwater vessel shipping, these cannot be purchased at the permanent expense of Balbriggan's ecological integrity, public health, local economy, and safety.

A development of this magnitude represents a permanent industrialisation of the North Dublin coastline. This submission outlines severe, unresolved structural contradictions between the proposed port framework and international best practices. It explicitly addresses key vulnerabilities regarding the local population, delicate ecosystems, and transportation infrastructure, concluding with a binding series of structural demands.

1. International Best Practice Frameworks

To evaluate a deepwater commercial infrastructure project of this scale, BCC benchmarks the proposal against established international industry standards:

- **The World Association for Waterborne Transport Infrastructure (PIANC)** "Working with Nature" Philosophy: Modern maritime design dictates that ecological processes must be integrated into the initial project conception rather than managed via retroactive, post-construction mitigation. Design must be inherently non-disruptive to existing hydrodynamic and biotic baseline conditions.



- **The ESPO (European Sea Ports Organisation) Green Guide:** This structure mandates that modern port expansions achieve absolute net-zero operational footprints, implement continuous real-time ambient acoustic and chemical monitoring, and preserve the "Integrated Coastal Zone" for community socio-cultural utility.
- **EcoPorts Eco-Information System (SDM):** Best practice requires a fully operational, transparent, publicly accessible environmental management system deployed prior to any structural site preparation or capital dredging works.

The current Bremore proposal fails to align with these foundational standards, displaying a reactive "mitigation-first" approach rather than an inherent "sustainable design" strategy.

2. Ecological Impacts & Environmental Vulnerabilities

The proposed site at Bremore directly intersects and bounds highly sensitive, legally protected marine and terrestrial ecosystems. The construction and operational phases threaten permanent, irreversible environmental degradation across several key vectors:

A. Avian Fauna & Special Protection Areas (SPAs)

The North Dublin coastline; specifically adjacent to the River Delvin estuary and nearby Rockabill to Dalkey Island SAC and the Skerries Islands SPA, serves as a globally significant corridor for migratory and nesting seabirds.

- **Specific Impacts:** Capital dredging and the construction of massive breakwater vectors threaten the feeding grounds of sensitive species, including Roseate Terns (*Sterna dougallii*), Light-bellied Brent Geese (*Branta bernicla hrota*), and Cormorants.
- **The Threat of Sensory Disruption:** Continuous high-intensity light pollution required for 24-hour port logistics operations disrupts avian navigation and nocturnal foraging behaviour. Furthermore, operational acoustic thresholds will cause permanent habitat displacement, driving vulnerable populations away from documented nesting and feeding grounds.



B. Marine Mammals, Aquatic & Benthic Ecology

The Irish Sea coastal waters host permanent populations of marine mammals protected under Annex IV of the EU Habitats Directive, including Harbor Porpoises (*Phocoena Phocoena*) and Grey Seals (*Halichoerus Grypus*).

- The heavy pile-driving, rock-armouring, and persistent low-frequency engine signatures of deepwater vessels generate severe underwater acoustic noise. This disrupts the echo-location capabilities of cetaceans, leading to chronic stress, disorientation, and acoustic displacement. BCC notes with grave concern that recent marine survey and developmental works associated with the **North Irish Sea Array (NISA)** have directly coincided with a spike in local cetacean mortalities, including one dolphin and four porpoises washing up deceased on Skerries Beach within the last 12 months alone. Stacking the massive capital dredging and structural construction of Bremore Port on top of these existing environmental stressors will cause irreversible baseline devastation to these protected populations.
- Benthic and Pelagic Devastation: Capital dredging to achieve deepwater berths will permanently alter local hydrodynamic flow regimes. The massive sediment plumes generated during dredging will dramatically increase water turbidity, smothering benthic communities, altering local fish spawning grounds, and choking macro-algal reefs.

C. Coastal Hydrodynamics & Hydrology

The introduction of extensive artificial hard structures into the dynamic marine interface alters littoral drift patterns.

- Specific Concerns: Modifying wave energy dynamics and sediment transport along the Bremore/Balbriggan shoreline risks severe accelerated coastal erosion at Cardy Rocks and Balbriggan Beach. Severe coastal erosion is already being seen close to the Martello Tower and BCC fears this will only be exacerbated further.



- Estuarine Disruption: The mouth of the River Delvin risks significant hydrological choking and altered salination gradients due to changed tidal flush cycles caused by the port's footprint, threatening local freshwater-marine migratory fish passages.

3. Impact on Balbriggan Residents & Socio-Economic Wellbeing

The human and social toll of constructing and operating a Tier 1 multi-modal commercial port directly adjacent to a high-density residential community cannot be understated.

- Port Operations Light/Noise **will** result in disrupted residents' sleep and wellbeing.
- Dredging & Chemical Runoff **will** result in the degradation of tourism & coastal amenities

A. Public Health: Air Quality, Light & Noise Pollution

- Atmospheric Degradation: The introduction of heavy maritime transport, coupled with heavy goods vehicles (HGVs), will cause significant local spikes in Particulate Matter (PM_{2.5} and PM₁₀) and Nitrogen Dioxide emissions. Prevailing coastal winds will carry these pollutants directly into Balbriggan's residential zones, exacerbating respiratory vulnerabilities within the population.
- Acoustic Intrusion: Operational noise from container handling, gantry cranes, reversing alarms, and shipboard auxiliary generators operates on a continuous 24-hour cycle. This industrial noise profile is completely incompatible with the existing ambient acoustic conditions of nearby residential estates.
- Light Trespass: Industrial-scale, high-mast LED security and operational lighting will create significant skyglow and direct light trespass, severely impacting the sleep quality and general wellbeing of nearby residents.

B. Local Economy, Tourism & Leisure Amenities

Balbriggan's long-term socio-economic strategy relies heavily on the rejuvenation of its coastal amenities, beach assets, and historic harbour area to drive local tourism and community health.



- **Amenity Degradation:** Increased maritime traffic, risk of minor chemical or fuel spills, and persistent operational debris will degrade the water quality and visual character of Balbriggan Beach and the surrounding coastline. This directly undermines public investment in local seaside infrastructure and threatens the recreational viability of the waterfront for swimming, sailing, and walking.
- **Visual Disruption:** The insertion of an imposing industrial landscape, characterised by high-density container stacks and towering gantry cranes, will permanently destroy the historic scenic vistas of the North Dublin coast, negatively affecting local property values and residential pride of place.

4. Traffic Infrastructure & Freight Congestion

The landward transport infrastructure requirements for the proposed port introduce severe logistical friction points across local and regional transport networks.

Freight from a deepwater port would need to travel via the R132 and other local arterial routes to access the M1 and its connecting road network. This would significantly increase traffic volumes, exacerbate regional congestion, and place heavy goods vehicles on roads that were not designed for such intensity or weight of use. The existing road network is already operating under considerable pressure and lacks the capacity to absorb this additional demand.

- **Arterial Choking:** The introduction of hundreds of additional daily HGV movements to transport freight from the port to the national transit network will place severe strain on local roads, particularly the R132 and arterial links to the M1 motorway.
- **Local Congestion & Safety:** Commuter networks within Balbriggan are already operating at peak capacities. Forcing heavy port traffic onto these local corridors creates structural gridlock, delays public transit lines, and introduces severe safety hazards for local motorists, cyclists, and pedestrians, particularly near school zones.



- Structural Infrastructure Stress: Local road networks were not designed to withstand the axle-weight frequencies of sustained modern freight logistics. This volume will accelerate the degradation of road surfaces, requiring intensive, continuous maintenance funded by the local tax base.

5. Cultural Heritage & Archaeological Continuity

The Bremore headland represents an internationally recognised landscape of **profound** archaeological importance, rich with documented and undocumented prehistoric features.

- Prehistoric Continuity: The site contains a highly significant complex of Neolithic passage tombs that predates Newgrange and forms a vital cultural link to the broader Boyne Valley archaeological landscape.
- Irreversible Destruction: Structural development, earthworks, and onshore clearing risk the physical destruction of unexcavated sub-surface archaeological assets. Furthermore, the industrialisation of the landscape permanently severs the visual and spatial connection between these ancient monuments and the sea, stripping them of their historical context and cultural meaning.

6. Summary of BCC Core Grievances & Policy Conflicts

Balbriggan Community Council highlights that the current development framework creates distinct, unmitigated friction points with prevailing local and national planning policies:

1. Direct Flouting of Local Development Objectives: The scale, pollution, and industrial nature of the proposed port directly contradict Fingal County Council's stated statutory goals regarding climate action, sustainable local community development, and the expansion of eco-tourism along the Dublin coastline.



2. Infringement of the VVI Gold Standard for Asset Integrity: In alignment with established local professional practices, BCC maintains that structural work must not proceed on any phase of this project while fundamental environmental, transport, and community design parameters remain unquantified and unresolved. Proceeding under the current framework constitutes piecemeal mitigation on a regional scale, compromising structural and environmental integrity.

7. Explicit Statutory Demands of the Balbriggan Community Council

To ensure the protection of the town and its natural resources, BCC demands that the relevant authorities enforce the following binding conditions prior to any progression of planning or structural authorisation:

- Demand 1: Complete and Transparent Environmental Impact Assessment (EIA). A comprehensive, multi-season Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) must be conducted by independent ecological bodies. This must include continuous, real-time baseline monitoring of local cetacean acoustics and migratory bird nesting timelines, with all data published fully to a transparent, unedited public portal.
- Demand 2: Mandatory Exclusion Zones & Construction Moratoriums. Structural design parameters must implement an absolute buffer zone around the Neolithic passage tombs at Bremore. Furthermore, a strict, legally binding construction moratorium must be enforced during peak avian nesting periods and marine mammal breeding windows to prevent catastrophic population shocks.
- Demand 3: Provision of Dedicated, Segregated Freight Infrastructure. The port developers must fund and construct an entirely independent, dedicated freight access corridor linking the port directly to the M1 motorway. No commercial HGVs associated with the port's construction or operational logistics shall be permitted to enter the R132 or any internal Balbriggan municipal road network at any time.



- Demand 4: Installation of Real-Time Acoustic and Atmospheric Mitigation. The port must be structurally fitted with shore-to-ship power links (Cold Ironing) to mandate that berthed vessels cut all auxiliary diesel engines. Automated, real-time noise and particulate monitors must be permanently deployed at the port boundaries adjacent to Balbriggan residential areas, with legally enforceable operational shutdown thresholds if safe human limits are breached.
- Demand 5: Establishment of a Community Reinvestment & Preservation Fund. A legally binding community wealth fund, financed via a fixed percentage of the port's operational revenue, must be established and administered by local representatives. This fund will be solely dedicated to the continuous preservation, environmental protection, and socio-economic enhancement of Balbriggan's public spaces, beaches, and historical coastal infrastructure.

Submitted on behalf of the Balbriggan Community Council (BCC)