Simon Musial

From: Stephen Purcell <stephen.purcell@futureanalytics.ie>
Sent: 23 January 2019 15:16
To: RSES
Subject: Tri-Aviation Project Co. Ltd. - Submission to EMRA Draft RSES. Zoned lands at Western Campus of Dublin Airport.
Attachments: 2-425 RPT Tri-Aviation Submission to EMRA Draft RSES v2.1.pdf

Mr. Jim Conway
Director
Eastern & Midland Regional Assembly
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Good afternoon Jim,

I trust you are keeping well.

On behalf of Tri-Aviation Project Co. Ltd. (88 Harcourt Street, Dublin 2, D02 Dk18), the Irish-registered project delivery entity of TRICAP Investments and partners, Future Analytics Consulting (23 Fitzwilliam Square South, Dublin), Chartered Town Planning and Development Consultants, wish to submit the attached submission. The submission relates to the public consultation of the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region published by the Eastern and Midland Regional Assembly. The lands in question are of key strategic importance nationally, and are zoned in the Fingal Development Plan 2017-2023 and designated for Terminal and Aviation-Related Development in the Dublin Airport Local Area Plan 2005-2015 (as extended).

We look forward to an acknowledgement receipt relating to this submission.

Given the very significant nature of the topic the subject of this submission, should the Eastern and Midland Regional Assembly find it beneficial to meet with Tri-Aviation Project Co. Ltd. to discuss their ambitions for this project, the role it has both for the regional and indeed the national economy please do not hesitate to make contact with me.

Many thanks in advance for your consideration of this submission.

Yours sincerely,

Stephen

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Submission to the

Regional Spatial and Economic Strategy

FOR THE EASTERN AND MIDLAND REGIONAL ASSEMBLY

Submitted on behalf of

Tri-Aviation Project Co. Ltd.

Prepared by

Future Analytics
Planning | Research | Economics

JANUARY 2019

Executive Summary

The Dublin region is the main global gateway to Ireland, with Dublin Airport one of the fastest growing Airports in Europe. As the principle gateway to Ireland, Dublin Airport represents the most significant single economic entity in the EMRA region. Protecting and improving access to Dublin Airport is identified as a key 'growth enabler' within the Draft RSES. A core component of the Draft RSES is the preparation of a Metropolitan Area Strategic Plan (MASP) for the Dublin Metropolitan Area (DMA). The MASP provides a 12-year strategic planning and investment framework for the Dublin metropolitan area and is aligned with a number of Regional Strategic Outcomes in the Draft RSES. The MASP contains a key *'Guiding Principle'* for the sustainable development of the DMA to **'improve access to Dublin Airport by public transport and road'** so that Dublin is positioned as a Global Gateway. Dublin Airport, therefore, has a pivotal role to play in achieving the overarching vision of the Draft RSES.

Dublin Airport will exceed its existing conditioned operational capacity during 2019. It is therefore necessary to plan for the airport's growth and it is pivotal that a strategic policy framework is in place that facilitates the future expansion of the airport within lands which have been identified as the optimal location for additional terminal facilities i.e. the Western Campus of Dublin Airport.

Chronic traffic congestion is widely acknowledged as just one of many examples demonstrating how the Eastern Campus is operating beyond suitable functioning capacity, and reaffirms the suitability of a Western Campus access. In order to dilute the levels of congestion currently focused on the east and rebalance development throughout the 'Dublin Airport Box', the relevant **'growth enabler'** within the finalised RSES should be bolstered as a measure to support the **sustainable expansion of Dublin Airport and facilitate the delivery of a third terminal in the Western Campus.**

There are fundamental benefits associated with promptly pursuing a third terminal on the Western Campus and risks associated with any undue delay. In order to preserve and maintain the efficient and effective operation of Dublin Airport, **it is critical that the East-West distributor road is targeted for transport infrastructure investment and engrained within the MASP as a priority investment project.** Every effort should be made to support this connection which is pivotal for facilitating access to Dublin Airport from the west and will significantly reduce the current pressure on the M1 and M50. The prioritisation of the East-West distributor road will fully align with the MASP's 'Guiding Principle' to **'improve access to Dublin Airport by public transport and road'** and position Dublin as a Global Gateway.

Facilitating the continued success and full potential of Dublin Airport should form a key consideration for Strategic Corridor No. 5. To appropriately plan for the future expansion of the airport, an extension of the MetroLink line is required to the Western Campus. Planning appropriately and sustainably for investment in transport infrastructure requires the inclusion of a connection to the planned terminal facilities in the Western Campus of the airport, and this should be engrained as a **key transportation infrastructure investment within Strategic Corridor No. 5.** Given the role Dublin Airport plays in positioning Dublin as a Global Gateway, MetroLink connections to the Western Campus should be **championed and supported by the Dublin MASP.** Anything less than the adoption of a clear route to serve the west of the airport site with station facilities for a third terminal would undermine the plan-led delivery of this massively important infrastructure project. in addition, this would fail to deliver a future proofed transport network, hampering growth of the airport and stifling economic growth prospects for the country.

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1.0 Introduction

The following submission has been prepared by Future Analytics Consulting Ltd. on behalf of Tri-Aviation Project Co. Ltd. ('Tri-Aviation') in response to the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA).

Tri-Aviation are the owners of a key landholding at Dublin Airport, comprising lands immediately to the west of the existing crosswind runway (runway 16/34). Tri-Aviation's lands were identified in the Dublin Airport Local Area Plan (LAP) 2006–2015 (as extended) as forming part of the 'Core Aviation Development Zone' and were the chosen location for future terminal facilities to serve Dublin Airport. The LAP was the genesis of several years of detailed and integrated land use and transportation analysis by multiple Departments within Fingal County Council, international experts appointed by Fingal County Council, and other major stakeholders, and indeed was endorsed by key stakeholders including Dublin Airport Authority (now daa).

Dublin Airport itself was the fourteenth busiest airport in Europe in 2017 (up one place from 2016) accommodating 29.6 million passengers in 2017, after handling 27.9 million in 2016. During 2018, Dublin Airport accommodated an unprecedented 31.5 million passengers. Dublin Airport is also the only coordinated airport in Ireland where demand from airlines exceeds capacity; meaning that more airlines than can be accommodated want to fly out of Dublin at the same time.

Dublin Airport's current capacity limit of 32 million passengers per annum (mppa) (prescribed by An Bord Pleanála) is forecasted to be reached in 2019. In this context, it is clear that airport terminal infrastructure will have to be expanded at the airport in the short to medium term. The intention that this additional capacity be provided in the form of a third terminal is well established in planning policy as well as featuring in previous planning assessments of terminal infrastructure at the site. It is apparent from the planning context for the airport site, that it has been historically accepted that this additional terminal will be provided in the western part of the site. Policies which actively support the expansion of Dublin Airport within the Western Campus should therefore be engrained in the RSES for the EMRA region.

The Draft RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region.

What the RSES Provides?
Spatial Strategy – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
Economic Strategy – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
Metropolitan Plan – to ensure a supply of strategic development areas for the sustainable growth and continued sucess and competitiveness of the Dublin metropolitan area.
Investment Framework – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
Investment Framework – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
Climate Action Strategy – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

Table 1.1: Objectives of the RSES.

The Dublin region is the main global gateway to Ireland, with Dublin Airport one of the fastest growing in Europe. As the principle gateway to Ireland, Dublin Airport represents the most significant single economic entity in the EMRA region. Protecting and improving access to Dublin Airport is identified as a key 'growth enabler' within the Draft RSES. Dublin Airport, therefore, has a pivotal role to play in achieving the overarching vision of the Draft RSES which seeks:

'To create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.'

However, capacity constraints at Dublin Airport have been forecasted and Dublin Airport is highly likely to reach and exceed its conditioned operational capacity during 2019. It is therefore necessary to now plan for the airport's growth and it is pivotal that a strategic policy framework is in place that facilitates the future expansion of the airport within the Western Campus lands.

2.0 Tri-Aviation and the Dublin Airport Western Campus

The Western Campus, which falls within the 'Dublin Airport box' is located in north County Dublin, outside the M50 motorway. Dublin Airport's boundary is defined in the Fingal Development Plan 2017–2023 (FDP) and extends from the M1 in the east to St. Margaret's by-pass (a small residential settlement) to the west, and from Naul Road and Forrest Little Road in the north to the Airport Perimeter Road to the south.

The Dublin Airport Local Area Plan 2006 (which had been extended to June 2015) divided the Designated Airport Area into two strategic development zones, one on either side of the cross runway. These are referred to as the Eastern Campus and the Western Campus.

Figure 2.1: Location of the Tri-Aviation land holding within the Western Campus of Dublin Airport.

The Tri-Aviation lands comprise approximately 55.9 ha, just north of runway 10/28 and the supporting taxiway area. The lands are situated to the west of existing Dublin Airport terminals and infrastructure. Adjoining the eastern boundary to the site are jet hangars, the Irish Aviation Authority (IAA) Dublin Control Tower, the Dublin Air Traffic Control Centre and the Dublin Airport Fire Station.

The terrain is extensive and flat, with no undulations. Primarily used for agricultural purposes at present, it is comprised of a series of open pastures defined by hedgerows, minor ditches and small lanes.

Tri-Aviation shareholders have invested significant capital and effort over the past 25 years in the pursuit of the goal of building a world-class terminal on the Western Campus. This would have the effect of transforming Dublin Airport into a global aviation hub and help to further unlock the potential of Ireland's island economy.

Tri-Aviation shareholders also have the track record and expertise in funding large infrastructure projects and working in partnership with governmental agencies worldwide. As such, Tri-Aviation's vision of developing, building, and operating a new world class third terminal on the Western Campus will ensure the safe and efficient functioning of Dublin Airport – **it will also result in a third terminal project delivery that accrues no direct cost or risk to the State/ taxpayer.** Recognising the foregoing, and the vision of Tri-Aviation to deliver a third terminal at Dublin Airport, there is a genuine prospect of effectively and sustainably increasing capacity at Ireland's principal international gateway. Extensive analysis and conceptual master-planning has already been undertaken, which provides for a comprehensive plan-led and phased delivery on the subject lands.

3.0 The Impact of Dublin Airport on the Irish Economy and the Economic Case for its Future Expansion

After almost a decade of economic decline and stagnation, the Irish economy has once again regained international competitiveness and has returned to a period of sustained growth. As an island nation, Ireland is far more dependent on the aviation sector than many of our continental neighbours and trading partners and Dublin Airport has played a pivotal role in the country's continued recovery. As Ireland's largest airport, Dublin Airport acts as the main point of entry for those travelling to and from Ireland, but also services connecting flights from other international destinations. Dublin Airport has experienced significant further passenger throughputin 2018, resulting in a 6% increase on 2017 totals. The Airport has been prioritised by national policy to become an international secondary hub[1] and has been widely recognised for its direct and indirect contributions to local and national economic performance. The total economic impact of Dublin Airport includes the activity directly related to the airport, the multiplier impacts that flow from it, and the other sectors of the economy facilitated by the airport. Dublin Airport is therefore essential for our tourism industry, for our trading relationships and for connecting Ireland with the rest of the world.

Direct Economic Impact	The employment, income and economic output associated with the operation and management of activities at the airport, including firms on-site at the airport and airport-related businesses located elsewhere near the airport.
Indirect Economic Impact	The employment, income and economic output generated by down-stream industries that supply and support the activities at the airport, such as booking flights, etc.
Induced Economic Impact	This captures the economic activity generated by the employees of firms directly or indirectly connected to the airport spending their income in the national economy.
Catalytic Impacts	These capture the way in which the airport facilitates the business of other sectors of the economy. As such, air transportation facilitates employment and economic development in the national economy by facilitating trade, tourism, investment and productivity growth.

Table 3.1: Economic Impacts of Dublin Airport. (Dublin Airport Economic Impact Study, prepared by InterVISTAS Consulting Ltd, 2015.)

[1] Department of Transport, Tourism and Sport (2015) *A National Aviation Policy For Ireland.*

DAA reports in it's 2017 'Economic Impact Study', that the total economic impact of the Airport is equivalent to 3.1% of Ireland's national GDP (€8.3 billion). Tourism alone was responsible for overseas earnings of €4.577 billion in 2016 (excluding carrier receipts – airfares and ferry costs). As a result, it is essential that the optimum functionality of Dublin Airport is preserved, as its successful operation generates substantial net positive growth for the Irish economy as a whole. The Airport also has the potential to act as a catalyst for a global hub and centre for trade and enterprise. Fostering growth at the airport is therefore of fundamental importance to the Irish economy, and both national and local planning policy support this stance.

> ***"As an island nation, excellent air connectivity for passengers and freight is particularly important. Access to markets is one of the key factors for companies in deciding where to locate. Good international access (e.g. range of destinations, frequency and cost) coupled with effective airport facilities and internal connectivity are key factors in mitigating the impact of Ireland's peripheral location in the eyes of potential investors, overseas customers, mobile employees and tourists."*** [2]

The total value of tourism and travel earnings from overseas visitors to Ireland in the third quarter of 2017 was €2.3 billion, equating to an increase of 2.1% when compared to the same period in 2016. Dublin Airport also reports that the total economic impact of the Airport is equivalent to 4% of Irelands, national GDP. As the primary gateway for international movement to and from the country, the expansion of Dublin Airport will therefore generate substantial net positive growth for the Irish economy as a whole.

Alongside the economic value of Dublin Airport as a gateway to the global economy, a significant number of jobs are supported by operations at the airport. The semi-state-owned daa operates and manages both Dublin and Cork airports, global airport retailing (with subsidiary ARI) and international aviation consultancy (with daa international). The company headquarters are located at Dublin Airport and daa currently has 3,000 employees in airport management and operation. Alongside daa, there are airlines, air traffic control, ground handlers, airport security, immigration, customs, airport retail all employing staff who operate directly from the airport, totally 15,700 jobs in 2015 (or 14,000 Full-Time Equivalents (FTE) jobs). The Dublin Airport Economic Impact Study[3] describes these figures in detail, with average incomes for these employees of €45,600 per FTE in 2015. In total, the study concluded that

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[2] Forfás, Enterprise Ireland and IDA Ireland (2014) *Joint Response by Forfás / Enterprise Ireland / IDA Ireland to CAR's Consultation on the 2014 Draft Determination for the Maximum Level of Charges at Dublin Airport.*

[3] Dublin Airport Economic Impact Study, prepared by InterVISTAS Consulting Ltd, 2015.

there were 97,400 jobs supported or facilitated by the airport and €6.9 billion contributed to Gross Domestic Product[4].

To calculate airport direct employment, it is necessary to relate this to the traffic throughput of an airport to produce an employment figure. This is usually equivalent to the number of employees per million passengers per annum[5]. A figure of 1,000 jobs for every million passengers has been historically accepted by the industry, although it obviously masks wide variations in employment at different airports, and the existing employment ratio to passenger numbers at the airport would not reflect this figure. However, using this approach and reflecting upon current employment levels at the Airport, we estimate that additional terminal capacity at a third terminal on the Western Campus to accommodate an additional 10 million passengers by 2030, **would equate to an additional job ratio directly associated with the airport of between 6,000 and 10,000.** There will also be job growth indirectly associated with the airport expansion and operation of a third terminal.

In addition to this, the construction of a third terminal represents a huge infrastructure project of national significance that will generate extensive employment during construction. Dublin Airport's T2 generated in the region of 10,400 jobs during construction and it is therefore expected that the construction of a third terminal will generate a similar number. Combining jobs created during construction, jobs associated directly with the operation of the new terminal and jobs created indirectly, there is potential for approximately 15,000 new jobs as a result of the construction of a third terminal in the Western Campus. Overall, it is clear that the economic impact of a third terminal on the Western Campus will be substantial and a positive addition to both the national and local economies.

[4] https://www.dublinairport.com/docs/default-source/default-document-library/click-here-to-view-the-2015-dublin-airport-economic-impact-study.pdf?sfvrsn=0

[5] ACI (Airports Council International)

4.0 Passenger Forecasts and the Expansion of Dublin Airport

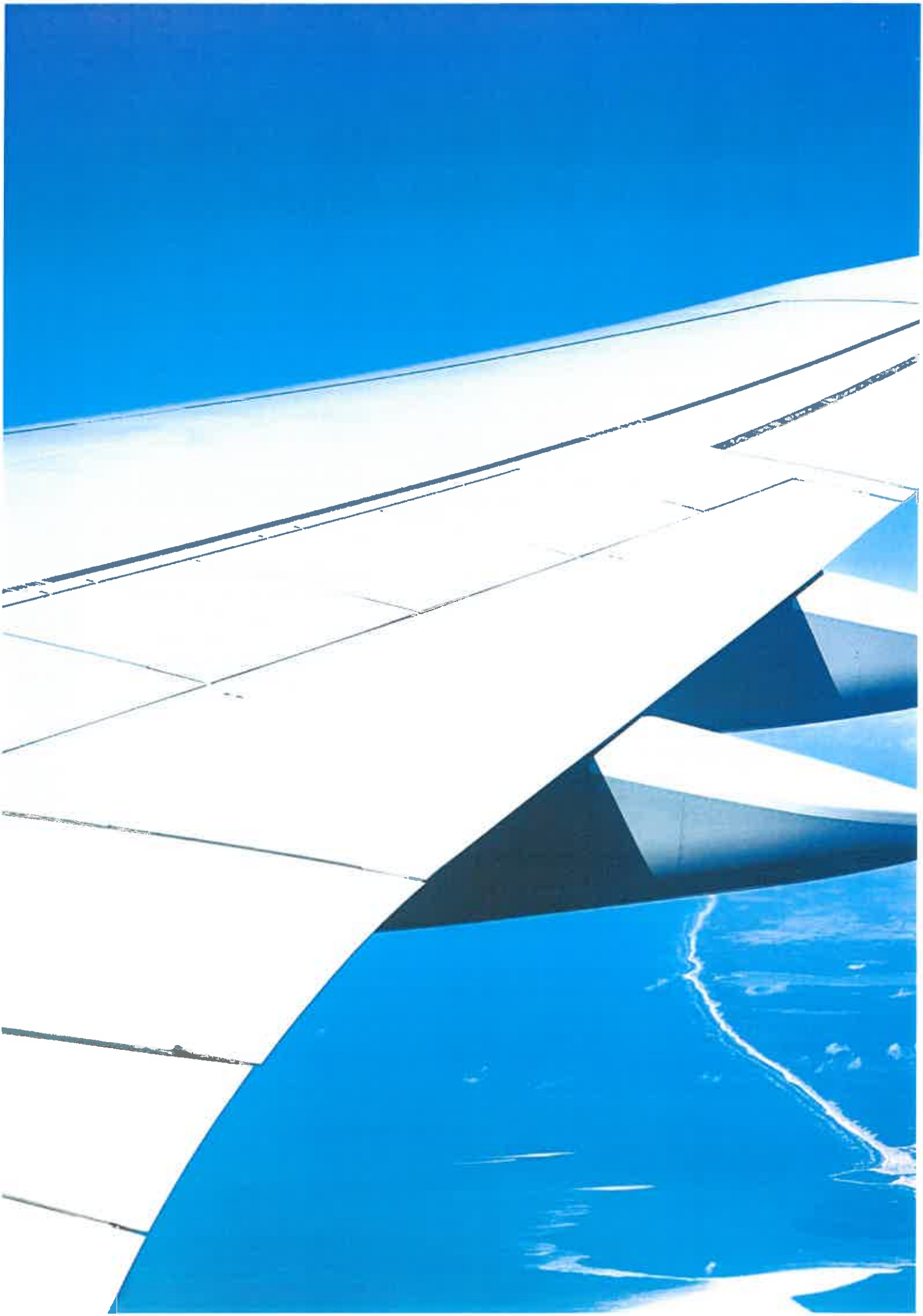
Passenger traffic is driven by several factors but by far the single biggest determinant is GDP Growth. A multiplier of 1.7 of GDP growth has been the average multiplier since 1991 according to International Air Transport Association (IATA) Economics. Applying that calculation to Ireland's current and forecasted GDP would mean a growth rate of some 5.1% per annum. This means that Dublin Airport would reach 51.5 million passengers by 2028 and 60m passengers in 2031 (just 12 years from now). The IATA growth model, coupled with the opening of the North Runway in 2021, demonstrates the urgent need to advance plans for a third terminal. It is noted that 2016 passenger data was used as the base in the forecast. However, the latest releases from the CSO reveal that growth between 2016 and 2017 was approximately 6% and between 2017 and 2018 it has been recorded as having sustained a growth rate of 6%.

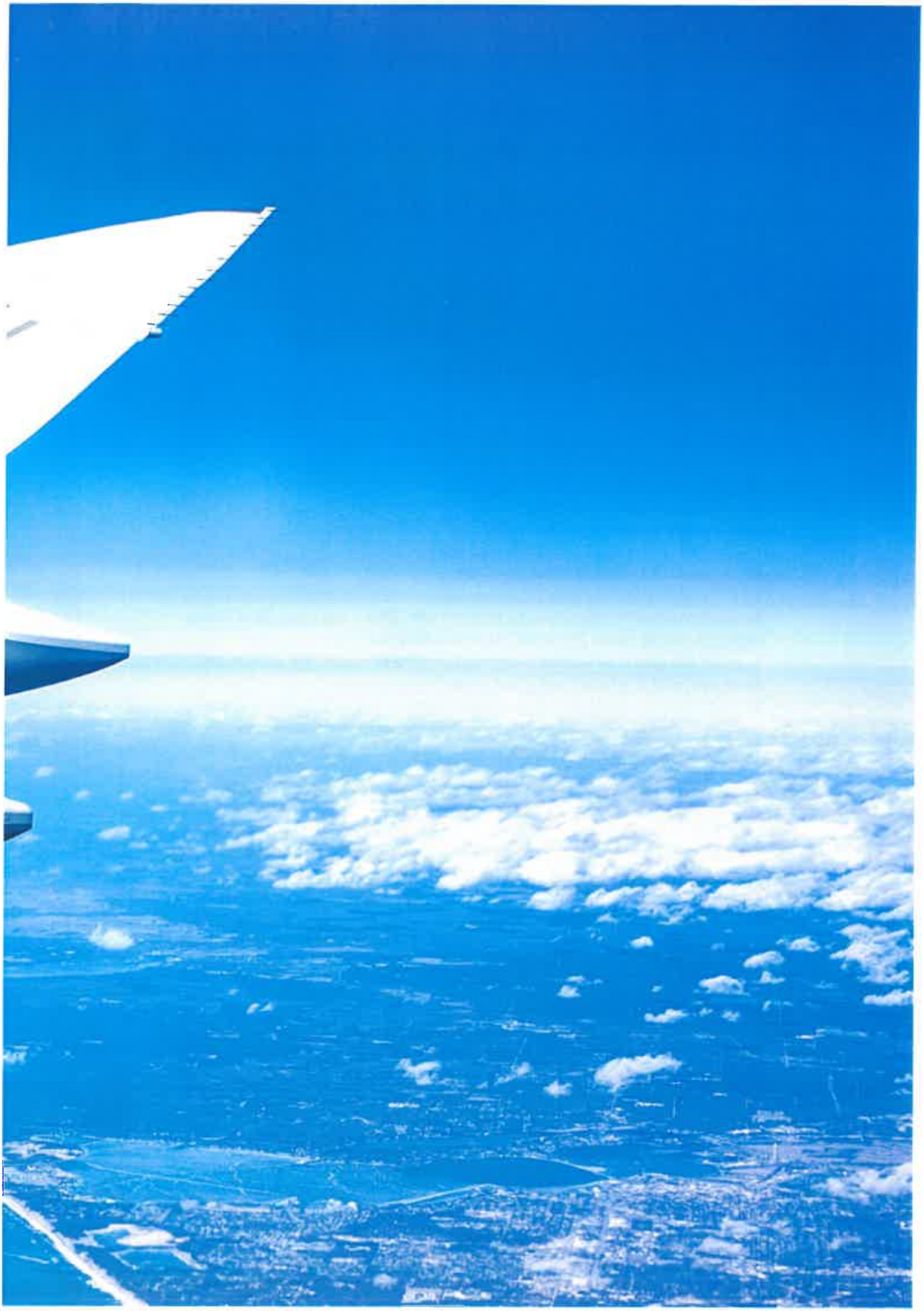
The foregoing assertions of a robust aviation sector are supported by Boeing and Airbus. In its *Commercial Market Outlook 2018–2037*, Boeing envisages an international outlook of 4.7% average annual passenger traffic growth up 2037[6]. They also note: *"...we view recent performance as evidence of real demand, not a bubble prone to burst in subsequent years".* This reinforces the strong overall growth at Dublin Airport, recognising that while downturns may occur, the fundamental change is positive. Airbus have cited the doubling of global passenger traffic every 15 years since the mid-1980s and anticipate it to double again up to 2021. In the years 2018–2037, Airbus expects robust passenger traffic growth of some 4.4% on average per annum[7].

Considering the foregoing assessment of forecasts, **Tri-Aviation asserts that the short-term demand has risen, and will continue to rise.** Consequently, it would be pragmatic to now accept and 'factor in' annual passenger growth rates of 6% in 2017 and 2018. Even with a moderating of the growth rate to 5% in 2019, 4% in 2020, 3% in 2021 and 2% per annum thereafter, passenger throughput will exceed:

- 32 mppa in 2019 – resulting in the existing planning consent throughput limit being met or exceeded;
- 36 mppa in 2025 – 'nameplate' capacity met or exceeded; and,
- 40 mppa in 2028 – a volume that would render the eastern campus highly compromised from both airside (craft movements), landside (chronic traffic congestion onto M1, M50 and local network) and terminal accommodation perspective[8] (and this would affect its safe and efficient operation).

[6] Boeing (2018) *Commercial Market Outlook 2018–2037.*
[7] Airbus (2018) *Global Market Forecast 2018–2037.*
[8] FAC Calculations, 2018.





5.0 The Planning Policy Context for the Expansion of Dublin Airport

5.1 National Aviation Policy

The Government's 'A National Aviation Policy for Ireland' provides a framework for the growth of aviation in Ireland, recognising the growth in the number of passengers that Irish airports will handle in the coming years. The policy document notes that Irish airports are expected to serve 33 million passengers per annum (mppa) by 2020. However, Dublin Airport alone accommodated 29.6 million passengers in 2017, increasing to 31.5 mppa during 2018, reflecting its importance nationally as a hub for international travel and connectivity.

The primary goals of National Aviation Policy are:

- To enhance Ireland's connectivity by ensuring safe, secure and competitive access responsive to the needs of business, tourism and consumers;
- To foster the growth of aviation enterprise in Ireland to support job creation and position Ireland as a recognised global leader in aviation; and
- To maximise the contribution of the aviation sector to Ireland's economic growth and development.

A series of Actions are proposed in the national policy document, intending to maximise the operational effectiveness and attractiveness of Irish airports (and Dublin in particular), cognisant of the positive impact that this can have on tourism and the economy. Action 4.1.2 places responsibility on "the Department, the airports and the tourism agencies... [to] continue to work together to increase access to Ireland from high-potential overseas tourism markets". This reflects the aspirations for Dublin Airport under Actions 4.3.1 to "be promoted as a secondary hub airport". Given Ireland's position on the periphery of the Eurasian landmass and on the eastern Atlantic fringe, the country has significant potential to act as a transatlantic hub for many airlines.

Action 4.5.1, relating to the construction of Dublin Airport's second runway, is underway and will provide the airport with the capacity to cater for additional passenger numbers in the future. However, other capacity constraints exist, such as the number of passengers the existing terminals can accommodate and congestion at aircraft piers and on aprons and taxiways. **Further investment in a new terminal and its related infrastructure is therefore necessary.**

The National Aviation Policy commits to, inter alia, *"creating conditions to encourage the development of new routes and services, particularly new and emerging markets"* and *"optimising the operation of the Irish airport network to ensure maximum connectivity to the rest of the world"*. Recognising the ambitious goals for Ireland and Dublin Airport, **it is vital for a third terminal to be delivered to prevent further congestion and bottlenecks that would stymy the airport and the State's performance potential.** It is also likely that **private investment** will be key to aiding its realisation, particularly given constraints on exchequer funding of large-scale capital investment projects. The private sector can be beneficial from a number of perspectives, delivering efficiency, productivity, competition and benefits for consumers as well as airlines.

5.2 National Planning Framework (NPF)

The Department of Housing, Planning and Local Government, on behalf of the Government, have prepared and published the finalised National Planning Framework under Project Ireland 2040. This forms the overarching policy and planning framework for the social, economic and cultural development of the country.

The NPF includes 'National Strategic Outcome 4, High Quality International Connectivity' which sets out the following objectives in relation to Airports:

- **The development of additional runway and terminal facilities such as the second runway for Dublin Airport for which planning permission has been approved;**
- Enhancing land-side access, particularly in public transport terms, such as through the Metro Link project in Dublin; and
- Careful land-use management of land-side areas to focus on the current and future needs of the airports. (Emphasis added).

Key future growth enablers for Dublin, also include *"Improving access to Dublin Airport, to include improved public transport access, **connections from the road network from the west and north** and in the longer term, consideration of heavy rail access to facilitate direct services form the national rail network in the context of potential future electrification."*

The NPF includes *High-Quality International Connectivity* as a National Strategic Outcome and recognises the crucial role that the provision of high-quality international connectivity has for overall international competitiveness and addressing opportunities and challenges from Brexit through investment in our ports and airports, in line with sectoral priorities already defined through National Ports Policy and National Aviation Policy and signature projects such as the second runway for Dublin Airport.

Amongst the objectives core to improving connectivity at Dublin Airport are: (1) developing the additional runway and terminal facilities, (2) enhancing *"land-side access"* and (3) ensuring *"careful land-use management of land-side areas to focus on the current and future needs..."*

As the NPF was prepared to define the planning and development of Ireland from a high-level, strategic perspective, it illustrates a cognisance of the Airport's primacy as the State's principal international gateway. Furthermore, it indicates the emphasis being placed on securing the safest and most sustainable, efficient and effective future for Dublin Airport's development. Consequently, for Dublin Airport to be a **'growth enabler' for Dublin and Ireland,** western access would facilitate the delivery of a third terminal in the Western Campus. The development of a third terminal within the Western Campus therefore fully aligns with national policy, representing the optimal location for additional terminal facilities at Dublin Airport.

5.3 Fingal Development Plan 2017-2023

As Dublin Airport is within the jurisdiction of Fingal County Council (FCC) (north of the city centre), the Fingal Development Plan 2017-2023 (FDP) is the relevant policy document to guide and support the physical and spatial development of the airport and its component parts in the future.

The FDP prescribes the 'airport box' with a broad, singular zoning: 'DA – Dublin Airport', arguably premised on the adoption and application of a new local area plan (see below) which will define zonings/areas in a more detailed way. The objective for the DA zoning is to *"ensure the efficient and effective operation and development of the airport in accordance with an approved Local Area Plan".* Its vision is to:

"...facilitate air transport infrastructure and airport related activity/uses only (i.e. those uses that need to be located at or near the airport). All development within the Airport Area should be of a high standard reflecting the status of an international airport and its role as a gateway to the country and region. Minor extensions or alterations to existing properties located within the Airport Area which are not essential to the operational efficiency and amenity of the airport may be permitted, where it can be demonstrated that these works will not result in material intensification of land use"

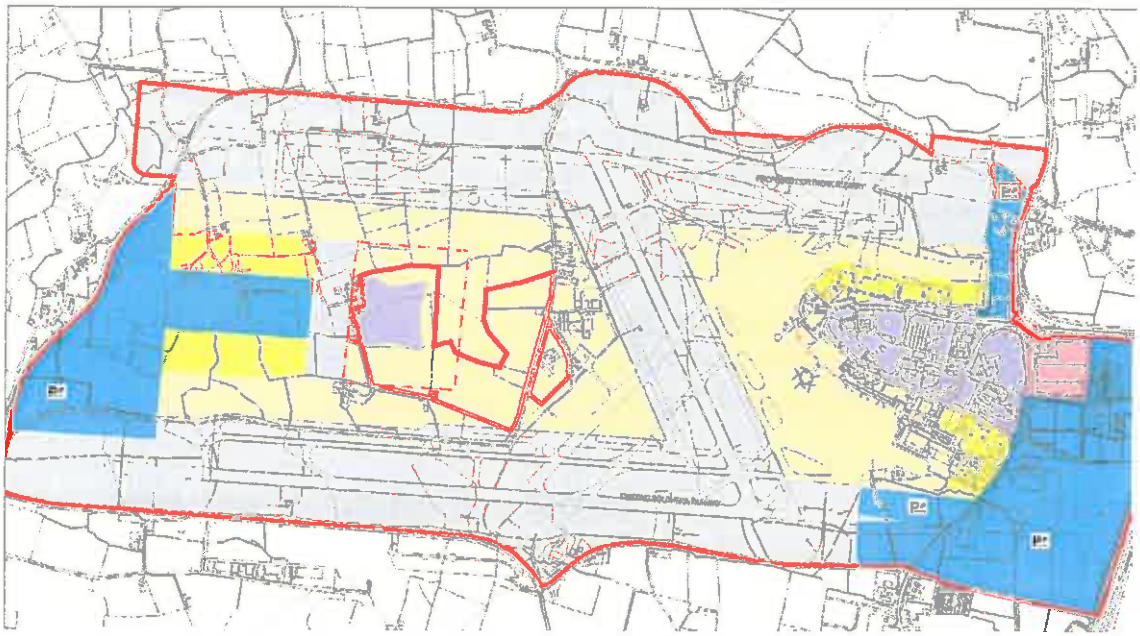


Figure 5.1: Location of the Tri-Aviation land holding within the Western Campus of Dublin Airport.

The importance to the County and State of Dublin Airport and the wider aviation sector is espoused throughout the FDP. Strategic Policy no. 9 seeks to:

> ***"Safeguard the current and future operational, safety, and technical requirements of Dublin Airport and provide for its ongoing development within a sustainable development framework of a Local Area Plan. The plan shall take account of any potential impact on local communities and shall have regard to any wider environmental issues."***

Dublin Airport Objective DA01, is to *"facilitate the operation and future development of Dublin Airport, in line with Government policy, recognising its role in the provision of air transport, both passenger and freight"*. This is augmented by Objective DA03, which seeks to *"safeguard the current and future operational, safety, technical and developmental requirements of Dublin Airport and provide for its ongoing development within a sustainable development framework, having regard to both the environmental impact on local communities and the economic impact on businesses within the area".*

Clearly FCC are asserting the provisions that are necessary to secure the future of Dublin Airport and are willing to support and facilitate the actions required for it to maximise its potential. This potential is epitomised by Objective ED30, which is to:

"Engage and collaborate with key stakeholders, relevant agencies and sectoral representatives to ensure that Dublin Airport is developed and promoted as a secondary hub to capitalise on the associated wider economic benefits for Fingal and the wider region."

FCC wish to promote opportunities to grow and develop Dublin Airport as a secondary hub. Objective ED31 is included which intends to:

"Ensure that the required infrastructure and facilities are provided at Dublin Airport so that the aviation sector can develop further and operate to its maximum sustainable potential, whilst taking into account the impact on local residential areas, and any negative impact such proposed developments may have on the sustainability of similar existing developments in the surrounding area, and the impact on the environment, including the climate."

Specifically, the FDP includes Objective DA04, to *"facilitate the on-going augmentation and improvement of **terminal facilities** at Dublin Airport"* [emphasis added]. There is a distinct understanding that the airport will need additional terminal facilities in the future to accommodate passenger growth, based on Objective DA04 and Objective DA05 (to increase runway capacities, which will induce greater passenger demand). The repeated references to the need to prepare a new Dublin Airport Local Area Plan during the life of the FDP (Objective ED89, Objective ED97, Objective DA02, Objective of 'DA – Dublin Airport zoning') are further evidence of FCC's intentions and the need for a plan now to define the future.

There are several references to climate and the environment in relation to Dublin Airport. It is proposed that consideration of the environment and climate change starts on the ground and will extend to the skies. Hence, this proposal for a third terminal at Dublin Airport is centred on an innovative and environmentally conscious design.

5.4 The Dublin Airport Local Area Plan 2006 (DALAP)

The DALAP was adopted in 2006 and was prepared in response to objectives in both the Fingal Development Plan 2005–2011 and South Fingal Planning Study (2004) to provide an optimal future development strategy for the Designated Airport Area. The DALAP was extended until 2015 and has now expired, however an objective to prepare a new Airport Local Area Plan is contained in the current County Development Plan and the process is currently underway.

The DALAP identified the Western Campus as the preferable and definitive location of a future third terminal. Furthermore, *"the land use plan developed for the Western Campus seeks to provide development zones to cater for the various facilities required in order to allow the airport to reach the maximum development potential for a twin parallel runway system". Such zones include taxiways and aprons, as well as other "ancillary related development".*

Importantly, the DALAP asserted that *"the proposed configuration within the LAP represents a good utilisation of existing infrastructure and assets whilst providing a balanced and local arrangement".* A terminal between the runways (as preferred in many successful international airports) facilitates quicker and more fluid access to such runways. It is also a more considered and efficient use of land which is generally limited in its capacity to provide residential and commercial development, given its context and related restrictions. These assertions were affirmed by Objective TP10;

> ***"to reserve lands to the west of the north-south runway 16/34, between the two parallel runways for the future expansion of the airport to the full potential of the twin parallel runway system, and to define a development box in which the appropriate terminal, pier and apron facilities can be provided".***

An Bord Pleanála in reviewing the planning application for T2 recognised that over-delivering on the Eastern Campus would lead to **unbalanced growth and excessive pressure on local road infrastructure** and permission for the development of Phase 2.

The DALAP acknowledged that the Western Campus would need to respond, *"to demand generated by airport capacity requirements and other commercial considerations"*, therefore *"due to the scale and ramifications of airport related choices, it is important that the LAP take a long-term view of the anticipated changes"*. However, as the DALAP's lifespan was limited, it proved difficult for it to define the airport's long-term future. Significant time, resources and expertise were dedicated to the preparation and adoption of the DALAP; yet while it has expired as a statutory plan, **the context and requirement for additional terminal with airport related infrastructure persists, alongside the principles established under the plan, which remain robust.**

A new Airport Local Area Plan is required to provide certainty and a vision for the future. Its aim should be to act as the principal development management tool for the Designated Airport Area, including specifications for the disposition and mix of uses in the airport area. However, **development of a new Plan does not necessitate alternative thinking. It requires logical, pragmatic planning and political support** – both contained in the former DALAP – and to be delivered by significant financial backing. The development of a third terminal in the Western Campus fully aligns with the sound principles that underscore the DALAP. Upgrades to the N2 primary road's capacity and connectivity to the terminal are supported (Objectives EA1, EA2, EA3, EA4 and EA8) as being integral to reducing congestion along the M1 motorway and at the existing Dublin Airport terminals. Tri-Aviation's proposal also envisages an environmentally conscious and exemplar architectural design, aligning with Objectives DS1 (architectural design), DS4 (design and public open spaces) and DS6 (environmental and sustainable development).

5.5 South Fingal Fringe Study

As far back as 2004, a South Fingal Planning Study concluded that a western access would be required to the 'Dublin Airport Box'. In 2006, the then Fingal County Council Chief Executive reflected that:

> ***'The South Fingal Planning Study, prepared on behalf of an international consortium of independent consultants, identified a clear need for the provision of a second east-west runway and recommended two parallel east-west runways, approximately 1,500 metres apart, as the optimal runway configuration for the long-term development of the airport'.***

As time has shown, the consent for the second runway reaffirms this development direction – making it all the more important to ensure that future terminal passenger capacity is accommodated on the Western Campus of the 'Dublin Airport Box'. The independent experts, in 2004, assessed that (and note that this was before T2 was consented):

> ***'To cope with this scale of change, and its expected continuation in the even longer term, the Airport's basic configuration will eventually have to change. From a single terminal, served by one main (east/west) and one minor (cross) runway, accessed by road from the east, it will need to become a 2-terminal, 2-parallel-runway airport, accessed by road from both east and west, and by rail at least from the south (into the eastern part of the airport holding).'***

A basic diagram of 2004 study illustrated this arrangement and is included below which envisages the location of the 2nd terminal in the western part of the site.

Figure 5.2: The South Fingal Transportation Study of the early 2000s, by an independent team advising FCC and led by Llewelyn Davies, concluded that future terminal development should be delivered on the western campus of the 'Dublin Airport Box'.

While ultimately the second terminal was provided to the east of the site, and that was the appropriate decision at that time, this study clearly supports the premise that terminal facilities should be supported in the western part of the site.

Figure 5.3: The subsequent delivery of T2 on the east lands has compounded the major airside, landside and overall operational challenges faced by Dublin Airport, and a third terminal must now be delivered on the western campus to safeguard the future operational efficiency of Dublin Airport.

Over the past two decades, planning policy and analysis has consistently concluded that a new terminal should be delivered on a fully planned Western Campus in the Dublin Airport Box, **supported by infrastructure (roads mostly) delivery from the Cherryhound Interchange, located at the N2/M2 corridor.** It is therefore critical to ensure that policy is engrained within the RSES which actively facilitates and supports the expansion of additional terminal facilities within the Western Campus lands.

5.6 Review of Future Capacity Needs at Ireland's State Airports

Tri-Aviation made a detailed submission to the Department of Transport, Tourism and Sport's publication of the Review of Future Capacity Needs at Ireland's State Airports ('Capacity Review') in late 2018. The principle findings of the Capacity Review were broadly welcomed and recognised as a gradual progression towards a clearly defined future for the development of Ireland's State-owned airports. This is particularly important for Dublin Airport as Ireland's primary international gateway for passengers and an increasingly important entry- and exit-point for air freight. However, given the onus placed on the Capacity Review by Fingal County Council, who have specifically delayed the review of the Dublin Airport LAP pending its publication (alongside other ongoing studies such as the South Fingal Fringe Transportation Study), it is considered important to highlight to EMRA that the Capacity Review gave insufficient due-regard to existing and established urban planning and development policy. **Indeed, it is critically important that the Regional Spatial and Economic Strategy recognises the sound principles underpinning the Dublin Airport LAP together with more recent policies, not least the 2018-adopted National Planning Framework which advocates the delivery of western access to the 'Dublin Airport Box'.**

Tri-Aviation supports the proposition of delivering a third terminal for Dublin Airport west of the crosswind runway, in the approximate area identified by the Capacity Review as 'Location 3'. The need for its delivery is becoming increasingly crucial due to landside, airside and external access demands and owing to prevailing constraints at the eastern campus. Furthermore, Tri-Aviation is committed to, and fully-capable of, realising the planning, construction and operation of a third terminal, and respectfully submit that the EMRA should afford policy support through the RSES given the strategic importance of an independently-developed third terminal on the western campus.

6.0 The RSES and Dublin Airport's Future Development

6.1 Growth Enablers and the Provision of Surface Access to Dublin Airport

The Dublin Metropolitan Area (DMA) is focused on the national capital city, which is the lead settlement in the country, the main gateway into the nation and the largest economic contributor in the state. Dublin leads the settlement hierarchy for not only the region but also the state, with no other comparable settlement within the urban structure and is home to 1.4 million or 3 out of 5 people in the Region.

The RSES notes that the key enablers for growth across the region align with the Growth Strategy and state the priorities for each part of the region to meet its potential. A key 'Growth Enabler' for the DMA is to **'protect and improve access to the global gateways of Dublin Airport and Dublin Port'.** An objective, which is engrained in local and national policy as highlighted earlier throughout this submission.

The recently published review of the future capacity needs of Irish State Airports[9] recognises the limitations on surface access from the east of the Airport complex and the constraints this would have on the Airport's development. Continued growth at T1 and T2 would exert further pressure on a heavily trafficked road network. This logic and the need to deliver balance to the development of the Airport was supported by the applicable LAP and acknowledged by the An Bord Pleanála Inspector reviewing the application for Terminal 2. The final An Bord Pleanála Order concluded similar:

> ***"...to expand further the terminal capacity at this location [Eastern Campus] would contravene the objectives EA2, EA3 and TP10 of the Dublin Airport Local Area Plan which seek to provide balanced road infrastructure to manage traffic and to cater for the comprehensive development of the airport."***

[9] Oxford Economics and Cambridge Economic Policy Associates (2018) *Review of Future Capacity Needs at Ireland's State Airports* Prepared on behalf of The Department of Transport, Tourism and Sport.[7] Airbus (2018) *Global Market Forecast 2018-2037.*

Recognising the existing pressures on surface access to Dublin Airport from the east and the deterioration that would be expected if significant additional passenger throughput rates utilised same - to comply with the FCDP, a new access must be pursued from the west as the only feasible option.

As time has shown, the consent for the second runway reaffirms this development direction – making it all the more important to ensure that future terminal passenger capacity is accommodated on the Western Campus of the 'Dublin Airport Box'. The road network (M1/ M50/R132) currently serving T1 and T2 is severely deficient and it is strongly submitted that the capability of surface access challenges being resolved at the east lands in the short, medium or indeed long-term is highly questionable.

The Transport Strategy for the Greater Dublin Area 2016-2035[10] acknowledges the challenges that the road infrastructure continues to face, especially at or close to Dublin Airport:

> ***"In a similar fashion to Dublin Port, Dublin Airport is currently dependent on the M1, M50 and the Dublin Port Tunnel as the principal means of landside access for all passengers and goods. Bus services to the airport, from all other parts of the island of Ireland use these routes, with the Port Tunnel being of particular importance for business travel between the airport, the IFSC and the wider city centre business district. As such, the current vulnerability of the main access routes to the Port and Airport to congestion associated with general traffic, presents a risk to their functionality and, by association, to the essential role they play as international gateways of high economic important at both a regional and national level".***

[12] National Transport Authority (2016). Transport Strategy for the Greater Dublin Area 2016-2035

The widely acknowledged chronic traffic congestion is just one of many examples demonstrating how the eastern campus is operating beyond suitable functioning capacity, and reaffirms the suitability of a Western Campus access, thereby diluting the levels of congestion currently focused on the east and rebalancing this throughout the 'Dublin Airport Box'. In this regard, the relevant **'growth enabler'** within the finalised RSES should be bolstered as a measure to support the sustainable expansion of Dublin Airport and facilitate the delivery of a third terminal in the Western Campus as follows:

> 'Protect and improve access to the global gateways of Dublin Airport and Dublin Port. Support the delivery of additional terminal facilities within the Western Campus to ensure the balanced development of Dublin Airport.'

6.2 Delivery of Road Access to the Western Campus

Tri-Aviation supports the need to meet both the immediate/short-term capacity requirements at Dublin Airport, but also the strategic medium- and long-term requirements. Accordingly, short-term incremental increases to Terminal T1 and T2 are accepted as a forced necessity to facilitate the continuation of current operations and to safeguard future opportunities at Dublin Airport. However, Tri-Aviation strongly advocates for the delivery of a new, separate third terminal (T3) on its lands to the west of the crosswind runway, and feels that even short-term reconfiguration of T1 and T2 will do little in contributing towards the efficient and effective operation of Dublin Airport.

There are fundamental benefits associated with promptly pursuing T3 on the Western Campus and risks associated with any undue delay. The recently published review of the future capacity needs of Irish State Airports[11] finds that the Western Campus lands would enable Dublin Airport to have a **'second front door'** and would provide for the construction of **'a new**

[7] Oxford Economics and Cambridge Economic Policy Associates (2018) *Review of Future Capacity Needs at Ireland's State Airports* Prepared on behalf of The Department of Transport, Tourism and Sport.[7] Airbus (2018) *Global Market Forecast 2018–2037.*

[11] Oxford Economics and Cambridge Economic Policy Associates (2018) *Review of Future Capacity Needs at Ireland's State Airports* Prepared on behalf of The Department of Transport, Tourism and Sport.

terminal with minimal disruptions to existing operations'. It also concludes that a greenfield site allows **optimal design and a modular or phased build**, which would align with the lapsed Dublin Airport LAP, and that a midfield terminal would offer operational efficiency and have **little impact to aircraft manoeuvring** at T1 or T2. Therefore, a decision should be made promptly on the future of Dublin Airport, and it is submitted that this requires planning certainty around T3 and associated supporting uses being delivered on the Western Campus, **including the delivery of future road access to the western campus of the Dublin Airport box.**

The Dublin MASP provides a 12-year strategic planning and investment framework for the Dublin metropolitan area and is aligned with a number of Regional Strategic Outcomes in the draft RSES which include managing the sustainable and compact growth of Dublin, the regeneration of cities and better use of under-used land, integrated transport and land use and the promotion of Dublin as a global city region.

The MASP is an integrated land use and transportation strategy for the metropolitan area that sets out
A Vision for the future growth of the metropolitan area and key growth enablers, identifying strategic corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors, existing and planned
Large scale strategic residential, employment and regeneration development opportunities and any infrastructure deficits or constraints that need to be addressed
A sequence of infrastructure priorities to promote greater co-ordination between Local Authorities, public transport and infrastructure providers for the phased delivery of sites.

Table 6.1: Role of the MASP

The vision for the Dublin MASP over the plan period is to:

'Build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area'

A key *'Guiding Principle'* for the sustainable development of the DMA is to **'improve access to Dublin Airport by public transport and road'** so that Dublin is a Global Gateway. The RSES highlights the importance of the alignment of the MASP and the NTA's Transport Strategy for the Greater Dublin Area (2016) which is key to the coordination of policy making and investment within the Dublin Metropolitan Area.

The MASP sets out key transport infrastructure investments in the metropolitan area as set out in national policy. More specifically, targeted road projects include:

- M4 Maynooth to Leixlip;
- M11 from Jn 4 M50 to Kilmacanogue;
- N3 Clonee to M50;
- M50 Dublin Port South Access; and,
- Adamstown and Nangor Road Improvements.

The existing local road network around the Western Campus consists mainly of single carriageway two-lane roads. Key regional roads adjacent to the Western Campus include the R108 and the R122. The sole exception to the above single carriageway roads is the four-lane, dual carriageway spur of M2 Motorway (Cherryhound Junction) to Broughan Roundabout, which has a substantially greater capacity as a result. Planned future road schemes in vicinity of Dublin Airport are laid out in various planning documents, details of which are presented in Figure 5.1 below. The delivery status of the abovementioned road schemes is uncertain. Although the road links which would form the Airport Box network, have been mentioned in various planning documents at least since 2006, no definitive (i.e. financial) commitments to their construction appear to have been made by the Fingal County Council (and are excluded from the Fingal County Council Capital Works Programme 2017-2019), National Transport Authority or daa.

Figure 6.1: Planned future road schemes

In order to preserve and maintain the efficient and effective operation of Dublin Airport, it is critical that the East-West distributor road is targeted for transport infrastructure investment and engrained within the MASP as a priority investment project. Objective **RPO 8.15 of the Draft RSES** recognises the importance of facilitating access from the west as follows:

'Support the National Aviation Strategy and the growth of Dublin Airport to include its status as a secondary hub airport, in particular the provision of a second runway and improved terminal facilities. Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, ***connections from the road network from the west*** *and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification.'*

As the most significant single economic entity in the EMRA region, every effort should be made to support this connection which is pivotal for facilitating access to Dublin Airport from the west and will significantly reduce the current pressure on the M1 and M50. Given eastern campus is currently operating beyond suitable functioning capacity, the prioritisation of the East-West distributor road will fully align with the MASP's *'Guiding Principle'* to **'improve access to Dublin Airport by public transport and road'** and position Dublin as a Global Gateway.

6.3 The Metrolink Route Configuration and Access to the Western Campus

The Dublin MASP identifies a phased sequence of infrastructure investment to enable the accelerated delivery of projects both within the short term to 2026; medium term in the lifetime of the draft RSES to 2031; and to the long term horizon of the NPF to 2040. 5 strategic corridors have been identified on the basis of their current and future development capacity and their potential to deliver agreed strategic outcomes such as; compact development; placemaking; accessibility to high quality public transport corridors; potential for economic development and employment creation and to support a reduced carbon footprint through greater energy efficiency and the creation of energy districts.

1. Within the M50 ring (Multi modal)	The proposed DART Underground and LUAS extensions to Finglas, Poolbeg and Lucan will support consolidation of Dublin city including the ongoing regeneration of Dublin Docklands and Poolbeg, redevelopment of older social housing, industrial and underutilised lands including Dunsink.
2. North-South Corridor (DART expansion)	The DART Expansion Programme will increase capacity to support ongoing development of the North Fringe lands and Donabate to the north and south to Woodbrook – Shanganagh, and the expansion of Bray- Fassaroe and, Old Conna linked to improved public transport connections.
3. Maynooth/Dunboyne line (DART expansion)	Strategic development areas along the Dunboyne/M3 parkway commuter line include the Dublin Enterprise Zone and Hansfield SDZ lands, the sequential development of lands in Dunboyne served by the M3 Parkway station and along the main line for sequential growth in Leixlip and Maynooth.
4. South-West Corridor (Kildare line-Luas red line)	The consolidation of the western suburbs at Clonburris, Kilcarbery and Adamstown SDZ, linked to increased capacity on the Kildare line, at Grangecastle supported by bus, brownfield regeneration at Naas Road and Tallaght and residential development of Fortunestown on the LUAS redline.
5. Metrolink Corridor (Metrolink/LUAS Greenline extension)	The development of the proposed MetroLink project, subject to appraisal and delivery will unlock significant long-term capacity in Swords-Lissenhall in South Fingal - Dublin Airport and in the south county at Sandyford, Cherrywood and Ballyogan linked to upgrading of the LUAS Greenline

Table 6.2: MASP Strategic Corridors

The MASP highlights that the development of Stategic Corridor No. 5 (Metrolink Corridor) will unlock significant long-term residential development capacity in Swords and Swords-Lissenhall and will support economic growth in future Metro Economic Zones in South Fingal and at **Dublin Airport, subject to the protection of airport capacity and accessibility**. The proposed Metrolink route will continue via the city centre and onwards to Sandyford using the existing LUAS Greenline and the proposed upgrading of this line will support new and emerging districts in the south county at Sandyford, Cherrywood and Ballyogan.

As highlighted throughout this submission, the continued growth of Dublin Airport is planned and includes additional terminal infrastructure to be delivered in the near future within the Western Campus. The airport represents essential economic value to the Country, generating a significant contribution towards national GDP. Therefore, facilitating the continued success and full potential of the airport should form a key consideration for Stategic Corridor No. 5. This fully aligns with National and Local Policy to encourage and support the expansion of infrastructure at Dublin Airport, which includes specific reference to further terminal facilities within the western section of the site. To appropriately plan for the future expansion of the airport, an extension of the MetroLink line is required to the Western Campus of the airport which is acknowledged as being the optimal location for additional terminal facilities.

A connection from the planned MetroLink T1&T2 Dublin Airport Station should therefore be provided to the third terminal within the Western Campus. This would appropriately respond to the future planned expansion of the airport into the west of the site and follows the accepted view that further airport expansion will be outside of the existing terminal areas in the Eastern Campus. Planning appropriately and sustainably for investment in transport infrastructure requires the inclusion of a connection to the planned 'T3' facilities in the western section of the airport, and this should be engrained as a key transportation infrastructure investment within Strategic Corridor No. 5.

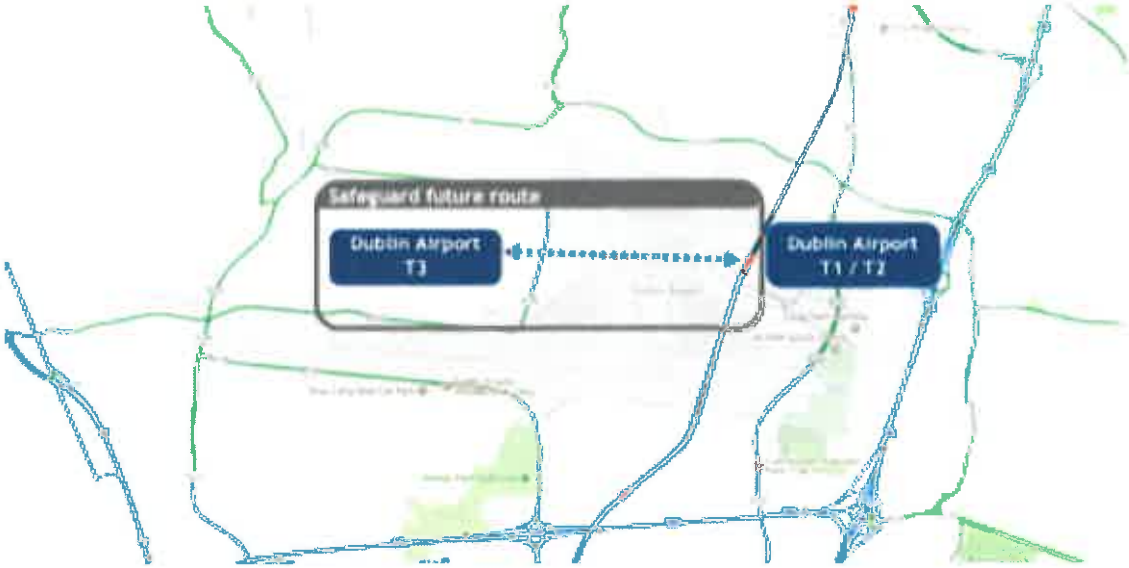


Figure 6.2: MetroLink Route Safeguarding Land-Side Access to Dublin Airport T3

Given the role Dublin Airport plays in positioning Dublin as a Global Gateway, MetroLink connections to the Western Campus should be championed and supported within the Dublin MASP. Anything less than the adoption of a clear route to serve the west of the airport site with station facilities for 'T3' would be sub-standard, fails to deliver a future proof transport network and will hamper growth of the airport, stifling associated economic growth for the country. In the absence of this solution, it is considered necessary to safeguard a future connection to the west of the airport site by MetroLink as a minimum.

7.0 Conclusion

Tri-Aviation, as the owners of a key landholding within the Western Campus at Dublin Airport, would like to commend the EMRA on the preparation of a robust strategy for the spatial and economic development of the region over the plan period. Tri-Aviation's lands within the Western Campus have been identified in the Dublin Airport Local Area Plan (LAP) 2006–2015 (as extended) as the chosen location for a future passenger terminal to serve the Airport. The context and requirement for an additional terminal with airport related infrastructure persists, alongside the principles established under the plan, which remain robust.

The Dublin region is the main global gateway to Ireland, with Dublin Airport one of the fastest growing in Europe. As the principle gateway to Ireland, Dublin Airport represents the most significant single economic entity in the EMRA region. Protecting and improving access to Dublin Airport is identified as a key 'growth enabler' within the Draft RSES. Dublin Airport, therefore, has a pivotal role to play in achieving the overarching vision of the Draft RSES.

As a result of significant increases recorded in passenger throughput and the existing capacity caps in place in the Eastern Campus, it is clear that airport terminal infrastructure will have to be expanded at the airport in the near future. It is apparent from the planning context for the airport site, that it has been historically accepted that this additional terminal will be provided in the Western Campus. Dublin Airport is highly likely to reach and exceed its conditioned operational capacity during 2019. It is therefore necessary to plan for the airport's growth and it is pivotal that a strategic policy framework is in place that facilitates the future expansion of the airport within the Western Campus lands.

Chronic traffic congestion is widely acknowledged as just one of many examples demonstrating how the Eastern Campus is operating beyond suitable functioning capacity, and reaffirms the suitability of a Western Campus access, In order to dilute the levels of congestion currently focused on the east and rebalance development throughout the 'Dublin Airport Box', the relevant **'growth enabler'** within the finalised RSES should be bolstered as a measure to support the **sustainable expansion of Dublin Airport and facilitate the delivery of a third terminal in the Western Campus.**

There are fundamental benefits associated with promptly pursuing a third terminal on the Western Campus and risks associated with any undue delay. In order to preserve and maintain the efficient and effective operation of Dublin Airport, **it is critical that the East-West distributor road is targeted for transport infrastructure investment and engrained within the MASP as a priority investment project**. As the most significant single economic entity in the EMRA region, every effort should be made to support this connection which is pivotal for facilitating access to Dublin Airport from the west and will significantly reduce the current pressure on the M1 and M50. The prioritisation of the East-West distributor road will fully align with the MASP's 'Guiding Principle' to **'improve access to Dublin Airport by public transport and road'** and position Dublin a Global Gateway.

Facilitating the continued success and full potential of Dublin Airport should form a key consideration for Stategic Corridor No. 5. To appropriately plan for the future expansion of the airport, an extension of the MetroLink line is required to the Western Campus of the airport which is acknowledged as being the optimal location for additional terminal facilities. Planning appropriately and sustainably for investment in transport infrastructure requires the inclusion of a connection to the planned terminal facilities in the Western Campus of the airport, and this should be engrained as a **key transportation infrastructure investment within Strategic Corridor No. 5.** Given the role Dublin Airport plays in positioning Dublin as a Global Gateway, MetroLink connections to the Western Campus should be **championed and supported by the Dublin MASP.** Anything less than the adoption of a clear route to serve the west of the airport site with station facilities for a third terminal is short sighted, fails to deliver a future proof transport network and **will** hamper growth of the airport, stifling associated economic growth for the country.

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