

Comhairle Rialaithe Aerforta Éireann
Eireannach Aerfort Átha Cliath
Co. Bhaile Átha Cliath Éire

T: 353-1-814-1111
F: 353-1-814-4120
www.daa.ie

daa public limited company
Head Office: Dublin Airport.
Co Dublin, Ireland



Eastern & Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
Main Street
Ballymun
Dublin 9
D09 C8P5

Date: 23rd January 2019

Ref No: Ref No: 2.2.23.003

Dear Sir/Madam,

RE: SUBMISSION TO THE DRAFT EASTERN AND MIDLAND REGIONAL SPATIAL AND ECONOMIC STRATEGY, 2018

daa plc welcomes publication of the *Draft Eastern and Midland Regional Spatial and Economic Strategy* ('Draft EMRSES') by the Eastern and Midland Regional Assembly ('EMRA'). The draft document represents a robust response to the requirement for a regional level strategic level planning document. On adoption, it will provide a positive framework to foster economic prosperity and drive regional growth.

daa welcomes this opportunity to provide further comment to shape the final strategy. By way of context, daa requested the following recommendations be considered in the preceding pre-draft submission:

- Unequivocally support passenger and movement growth at Dublin Airport, recognising its critical role as a strategic national asset;
- Support key enabling access infrastructure, including that recommended in the Greater Dublin Area Transport Strategy;
- Provide the necessary spatial planning policies to support the safe and effective operation of Dublin Airport at regional level; and,
- Designate Dublin Airport as an Airport Economic Zone.

An Bord Stúirthóirí | Board of Directors: Basil Geoghegan, Niall Greene, Patricia King, Colm McCarthy, Barry Nevin, Eric Nolan, Paul Mehlhorn, Denis Smyth, Risteard Sheridan, Dalton Philips - Príomhfheidhmeannach/Chief Executive

Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire
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The Draft EMRSES addressed and acknowledged these considerations and in so doing, will provide a positive planning policy platform on which Dublin Airport can continue to grow to meet the needs of the regional and national population in terms of international connectivity and as an economic enabler.

The following submission is made with the intention of highlighting some suggested additions to the text to expand on the draft policies. Notwithstanding suggestions made herein, daa gratefully acknowledges the strong recognition given by the Draft EMRSES to the important role of Dublin Airport, and we consider the proposed regional policies will provide a positive framework for Dublin Airport to continue in that role.

RECOMMENDATIONS FOR THE FINAL EMRSES

The following recommendations are made using the existing text within the Draft EMRSES to form the basis of the suggested changes. Suggested changes are colour coded to indicate:

- Existing Text: *Italic typeface*
- Insertions: ***Green bold italics***
- Omissions: ~~*Red strikethrough-italics*~~
- Relocation: ***Blue Bold italics***

Recommendations are made in the order in which the text appears in the Draft EMRSES and are not presented in any order of priority.

RECOMMENDATION 1: EMPLOYMENT AT DUBLIN AIRPORT

The draft EMRSES designates Swords as a Metropolitan 'Key Town', being a large active service town directly linked to Dublin City with good transport links and capacity to grow. Aligned with this designation, and acknowledging the proximity of Swords to Dublin Airport, the draft EMRSES identifies opportunities for airport-related economic development linked to the protection of access to Dublin Airport.

daa fully supports this policy position, recognising Swords as a dynamic County Town with potential to grow. We also ask that clarity is provided to recognise the role that non-aviation related economic development might play through recognition that Dublin Airport has vacant brownfield development sites which can be mobilised quickly and easily to provide readily available employment lands with good access to public transport (including future MetroLink). The airport is also within striking distance of the population centres of Swords as well as the north fringes of Dublin City, such as Santry and Ballymun.

| Suggested Amendment: Section 4.6 | Ref page |
|--|----------|
| <i>There are also opportunities in the wider Swords-Airport area for significant airport-related economic development, <i>including on vacant airport lands,</i> linked to protection and enhancement of access to Dublin Airport <i>lands.</i></i> | 54 |

We note the economic benefits of Dublin Airport Central, which is currently under construction, and the remaining High Technology zoned lands (circa 28ha) at Dublin Airport which have the potential to bring further inward investment to the Region and promoting compact urban growth within the Dublin Metropolitan Area. This employment zone could also be further recognised in Section 6.4 of the RSES discussing the Region's economic engines – particularly in the context of its location on the Dublin – Belfast Economic Corridor.

RECOMMENDATION 2: SUPPORT FOR AIRPORT GROWTH IN THE MASP

The Draft EMRSES provides support for the growth of Dublin Airport to very positive effect in Section 8.5 through Policy Objective RPO 8.15 which provides it is regional policy to:

“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....” (Draft EMRSES, page 155)

This policy confirms the strategic role of Dublin Airport to grow international connectivity, as well as providing support for the infrastructure required to achieve this.

Recognising this support, daa ask that this policy for airport growth is also recognised in Chapter 5 outlining the *Dublin Metropolitan Area Strategic Plan* ('MASP'). The MASP is a core element of the EMRSES as it will have statutory underpinning to act as 12-year strategic planning and investment framework for the city metropolitan area¹. Currently, the MASP sets a positive 'Vision' for Dublin Metropolitan Area as a *“smart, climate resilient and global city region...”*² and sets several guiding principles to achieve the Vision (Section 5.3). These include support for the growth of Dublin Port and support for good access to Dublin Airport. daa respectfully suggest that support for growth of Dublin Airport is reflected in the MASP also. This will ensure consistency and remove ambiguity. This clarification is acutely important given that the MASP's critical function addressing high-level and long term strategic development issues³.

As a context for this request, Dublin Airport is approaching 32 million passengers per annum ('mppa'). daa shortly intends to apply for planning permission to increase permitted passenger levels. A second application will also be made to amend planning conditions attached to the North Runway which would allow the runway to be used to best effect and deliver the best return economically from national investment in this strategic piece of infrastructure. Strong support at regional level for these initiatives through support for airport growth is crucial to ensuring there is no ambiguity as to their appropriateness and to underline their national and regional strategic importance.

¹ National Planning Framework, 2018, page 134

² Draft EMRSES, page 66

³ National Planning Framework, 2018, page 134

| Suggested Amendments: Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area | Ref page |
|--|----------|
| <i>Dublin as a Global Gateway – Support international connectivity through growth of Dublin Airport in terms of passengers and air traffic movements in line with industry requirements. Improve access to Dublin Airport by public transport and road and facilitate the continued growth of Dublin Port and improved access to/from the southern port area.</i> | 67 |

There is also an opportunity to strengthen guiding principles of the MASP to help capitalise on vacant and available land at Dublin Airport for employment opportunities. This would take advantage of its strategic location, good public transport linkages and proximity to large and growing centres of population such as Swords. daa suggest the following amendments to the text to support delivery of these sites.

| Suggested Amendments: Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area | Ref page |
|---|----------|
| <i>Employment density in the right places – Re-intensify employment within the city and suburbs and at other strategic opportunity sites proximate to public transport nodes, such as Dublin Airport, and to activate strategic employment opportunities to complement existing employment hubs in the city centre, and near third level institutes.</i> | 67 |

RECOMMENDATION 3: INTERNATIONAL CONNECTIVITY

Section 8.5 of the Draft EMRSES, as quoted above, provides direction in respect of airport growth and international connectivity, setting key planning policies for the future development of Dublin Airport.

Good surface access to airports and ports is exceptionally important, in terms of passengers having access to the airport for flights, as well as for inbound passengers making their onward journey. This is captured to positive effect in the two policies highlighted in the ‘International Connectivity’ section⁴. What could be further built on however, is the importance of growing and building on existing strong air routes and adding new ones. Fostering international connectivity, as the NPF requires, necessitates an increase in aircraft movements and the passengers who underpin these routes. Strengthening policy RPO 8.15 quoted above, to expand upon the aspirations of the National Aviation Policy and would help to assist this national level strategic objective.

As the Draft EMRSES correctly points out, the NPF supports additional development at Dublin Airport including terminal facilities and delivery of the North Runway. It is important now to add further clarity and detail through the mechanism of the RSES for those other facilities that are much needed to provide the operational efficiencies and quality of service that passengers and airlines require from the national airport.

⁴ RPO 8.13 (page 154) and RPO 8.15 and 8.16 (page 155)

In line with the above recommendations, daa suggest the following additions to Policy RPO 8.15 which would provide critical policy support for the airport to grow. To streamline policies for Dublin Airport, we also respectfully suggest that all surface access issues be dealt with under one policy RPO 8.16, allowing airport growth and the infrastructure required to facilitate that growth, be dealt with under RPO 8.15.

| Suggested Amendments: Section 8.5 International Connectivity | Ref page |
|---|----------|
| <p>RPO 8.15: Support the National Aviation Strategy Policy for Ireland and the growth of movements and passengers at Dublin Airport to include secure its status as a secondary hub airport. In particular, support the provision of a second runway, and improved terminal facilities increased permitted passenger throughput, efficient and effective airfield development, including improved taxiway system and additional aircraft stands and other essential airport services and facilities. [Relocate following text to RPO 8.16:] 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.</p> | 155 |

The importance of good access to Dublin Airport is a recurring theme both in the RSES and in the National Planning Framework, and daa recognises and supports good access as a key priority. However, we are keenly aware that any access constraints should not have the effect of acting as a barrier to airport growth. Recognising the national imperative to build global connectivity, infrastructure bottlenecks will be realised through prioritised investment (such as MetroLink) and collaborative cross-agency working. In the interim, Dublin Airport must be allowed to grow to meet domestic and global demand to ensure that the acknowledged benefits of increased global connectivity are not lost to other airports in other jurisdictions. Prioritising airport growth in the first instance will also ensure the requisite demand to underpin the financial feasibility of such infrastructure.

Aligned with this, the Draft EMRSES should consider providing for the whole range of means by which people access Dublin Airport, including providing for appropriate levels of car parking. This would recognise that passengers travel to Dublin Airport from a nationwide catchment, travelling at times and from places that are not necessarily conducive to taking public transport. Lastly, the character of the airport journey is different to that of a commute, with passengers' travel encumbered by luggage and typically travelling at off peak hours.

| Suggested Amendments: Section 8.5 International Connectivity | Ref page |
|---|----------|
| <p>RPO 8.16 [Moved from RPO 8.15:] <i>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. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of short, medium, long term parking and car hire parking, recognising Dublin Airport serves a national catchment. Ensure access does not act as a barrier to airport growth.</i></p> | 155 |

RECOMMENDATION 4: AIRPORT SAFEGUARDING

Firstly, daa recognise and welcome that the Draft EMRSES has fully reflected daa's recommendations in terms of airport safeguarding for the airport noise zones. Having taken on board the pre-draft submission by daa, we would be grateful if one further clarification is made by the EMRSES in policy RPO 8.17 in respect of the provision of appropriate levels of noise attenuation for noise sensitive uses proposed within the outer noise zone.

| Suggested Amendments: Section 8.5 International Connectivity | Ref page |
|---|----------|
| <p>RPO 8.17: <i>Spatial planning policies in the vicinity of the airport shall recognise and reflect the airport noise zones associated with Dublin Airport. In particular within the Inner Airport Noise Zone provision of new residential and/or other noise sensitive development shall be actively resisted. Within the outer noise zone provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise insulation in all cases.</i></p> | 155 |

In the pre-draft submission, daa had asked for recognition of the airport operator in considering planning applications in the vicinity of Dublin Airport. Accepting the existing role of daa as a statutory consultee, we set out a number of these considerations in a new suggested policy, such that a competent authority might be aware of them in undertaking its development management function.

In addition to this, we ask that the EMRSES acknowledge that there are policies which in one respect might have positive implications in general planning and environmental terms, but aviation terms, may not be practically or safely implemented in an airport context. For example, a Development Plan may require a riparian buffer zone either side of watercourses⁵ or require the use of SUDS which can include creation of attenuation ponds⁶. However, in practice on an airfield or close to an airport, the implementation of these policies may have the

⁵ For example, Objective WQ05 of the Fingal Development Plan 2017

⁶ For example Objective Objective SW04 of the Fingal Development Plan 2017

dangerous and unwanted effect of attracting wildlife and foraging birds to watercourses on the airfield and/or along flight paths. This is entirely incompatible with the safe movement of aircraft and their passengers.

Indiscriminately requiring sizable wildlife buffer zones on airport lands also places an unsustainable restriction and constraint on the airfield, severely impacting the not only safe operation of the national airport but undermining a national piece of strategic infrastructure in terms of the best use of available airport land and capitalising on investment.

The following suggested policy addresses these concerns:

| Suggested Amendments: Section 8.5 International Connectivity | Ref page |
|---|------------|
| <p><i>RPO 8.18A: Spatial planning policies in areas surrounding Dublin Airport will reflect the need to ensure the safe navigation of aircraft, in particular, to protecting against Bird Hazard, Glint and Glare Impact, intrusion into Obstacle Limitation Surfaces and/or interference with navigational aids. Careful consideration will be given to SUDS Drainage proposals in the vicinity of airports and requirement for wildlife buffer zones around watercourses on airport lands will be resisted. Wildlife buffers and open water proposals will be resisted where there is potential to attract wildlife which would pose a risk to aviation safety (passengers) and in order to make best use of national infrastructure.</i></p> | <p>155</p> |

RECOMMENDATION 5: IMPLEMENTATION OF THE RSES

Section 12.3 of the EMRSES provides for its implementation strategy, focusing on delivery of the Regional Strategic Outcomes. Policy RPO 12.1 provides:

*“Following adoption of the RSES the EMRA will establish a RSES implementation group to oversee progress on the implementation of the MASP for Dublin.”
(EMRSES page 191)*

One of the central tenets guiding the growth of Dublin Metropolitan Area is to expand international connectivity to realise the role of Dublin as a Global City Gateway. Recognising the strategic role of Dublin Airport to achieving this aspiration, daa would welcome an opportunity to contribute and shape the implementation strategy through a position on the MASP implementation steering group to ensure this important objective is achieved.

SUMMARY AND CONCLUSION

The strategic importance of Dublin Airport, the growth of which is critically linked with the Irish economy, is well represented within the Draft EMRSES. Further, it provides a strong framework for land use policies guiding development in the vicinity of the airport to ensure continued safety and security of aircraft in flight. daa welcome and fully support the effort which has been made to protect and build

on the national airport, which provides a world-class gateway, makes best use of national capital investment and creates an airport of scale that allows Ireland to compete globally for new routes and connectivity.

This submission principally aims to secure the future growth of Dublin Airport through the mechanism of the RSES. This growth in passenger numbers and air traffic movements will achieve international connectivity as envisaged in the NPF, as well as aspirations for a 'global city region' as envisaged in the Draft MASP. Expanding routes and movements will provide social and cultural links, foster economic growth, improve accessibility for inbound tourism, and, critically, increase the attractiveness of the region and country to international businesses looking to invest.

We would welcome any opportunity to present the recommendations made in this submission to you by way of a meeting or through further discussions. Should you require any further information on any aspect of this submission, please do not hesitate to contact us.

Yours faithfully,

pp. Jane Roche

Yvonne Dalton
Group Head of Planning

Appendix 1: Summary Table of Recommended Draft EMRSES Amendments

| EMRSES Recommendations | Ref page |
|---|----------|
| <p>RECOMMENDATION 1: EMPLOYMENT AT DUBLIN AIRPORT</p> <p><i>There are also opportunities in the wider Swords-Airport area for significant airport-related economic development, including on vacant airport lands, linked to protection and enhancement of access to Dublin Airport lands.</i></p> | 54 |
| <p>RECOMMENDATION 2: MASP</p> <p><i>Dublin as a Global Gateway – Support international connectivity through growth of Dublin Airport in terms of passengers and air traffic movements in line with industry requirements. Improve access to Dublin Airport by public transport and road and facilitate the continued growth of Dublin Port and improved access to/from the southern port area.</i></p> <p><i>Employment density in the right places – Re-intensify employment within the city and suburbs and at other strategic opportunity sites proximate to public transport nodes, such as Dublin Airport, and to activate strategic employment opportunities to complement existing employment hubs in the city centre, and near third level institutes.</i></p> | 67 |
| <p>RECOMMENDATION 3: INTERNATIONAL CONNECTIVITY</p> <p><i>RPO 8.15: Support the National Aviation Strategy Policy for Ireland and the growth of movements and passengers at Dublin Airport to include secure its status as a secondary hub airport. In particular, support the provision of a second runway, and improved terminal facilities increased permitted passenger throughput, efficient and effective airfield development, including improved taxiway system and additional aircraft stands and other essential airport services and facilities.</i></p> <p><i>RPO 8.16 [Moved from RPO 8.15:] 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. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of short, medium, long term parking and car hire parking, recognising Dublin Airport serves a national catchment. Ensure access does not act as a barrier to airport growth.</i></p> | 155 |
| <p>RECOMMENDATION 4: AIRPORT SAFEGUARDING</p> <p><i>RPO 8.17: Spatial planning policies in the vicinity of the airport shall recognise and reflect the airport noise zones associated with Dublin Airport. In particular within the Inner Airport Noise Zone provision of new residential and/or other noise sensitive development shall be actively resisted. Within the outer noise zone provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise insulation in all cases.</i></p> <p><i>RPO 8.18A: Spatial planning policies in areas surrounding Dublin Airport will reflect the need to ensure the safe navigation of aircraft, in particular, to protecting against Bird Hazard, Glint and Glare Impact, intrusion into Obstacle Limitation Surfaces and/or interference with navigational aids. Careful consideration will be given to SUDS Drainage proposals in the vicinity of airports and requirement for wildlife buffer zones around watercourses on airport lands will be resisted. Wildlife buffers and open water proposals will be resisted where there is potential to attract wildlife which would pose a risk to aviation safety (passengers) and in order to make best use of national infrastructure.</i></p> | 155 |
| <p>RECOMMENDATION 5: MASP IMPLEMENTATION</p> <p>daa would welcome an opportunity to participate in the MASP Implementation Group.</p> | n/a |

