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

Date: 12th April 2019

Ref No: Ref No: 2.2.23.003

Dear Sir/Madam,

RE: SUBMISSION TO THE PROPOSED MATERIAL AMENDMENTS TO THE DRAFT EASTERN AND MIDLAND REGIONAL SPATIAL AND ECONOMIC STRATEGY

daa welcomes the publication of the *Proposed Material Amendments to the Draft Eastern and Midland Regional Spatial and Economic Strategy* ('Proposed Material Amendments version of the Draft EMRSES') by the Eastern and Midland Regional Assembly ('EMRA').

This submission follows our response to the Draft EMRSES, dated 23rd January 2019. In this submission, daa outlined support for the EMRSES and considered that, upon adoption, it would provide a positive framework to foster economic prosperity and drive regional growth.

Having reviewed the Proposed Material Amendments version of the Draft EMRSES, daa is grateful for the opportunity to input into this stage and we acknowledge the effort that has been made to incorporate our recommendations into the document. The pivotal role that Dublin Airport plays in the growth of the economy is conveyed with strength and the Draft Strategy provides a strong support for the growth and expansion of Dublin Airport.

It is noted that while many proposed amendments have been incorporated at the material alterations stage, certain proposed alterations have not been included. The basis of these decisions are detailed in the Second Director's Report which provides a summary and explanation of the recommendations made to the Draft EMRSES.

The necessity to ensure that all content is appropriate for a regional tiered policy document is recognised and accepted. Recognising this and having regard to the Directors Report,

An Bord Stiúirthóirí | 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

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daa wishes to identify and strengthen the proposed wording for two particular key items, these being:

- the growth of Dublin airport, not just relating to its aviation function, but also the non-aviation related economic development opportunity that it presents, and;
- the safeguarding of Dublin Airport through appropriate land use planning policy to ensure aircraft safety, and;

As per our previous submission, the following recommendations are made using the existing text within the Proposed Material Amendments version of the Draft EMRSES. Suggested changes are colour coded to indicate:

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

RECOMMENDATION 1: EMPLOYMENT AT DUBLIN AIRPORT

Amendments to Section 4.6 Key Towns

daa would like to iterate our support for a policy position which recognises Swords as a dynamic County Town with potential to grow and highlights Dublin Airport as a key contributor.

In our submission dated 23rd January 2019, daa asked for clarification to be provided to ensure the role that Dublin Airport can play in non-aviation related economic development is recognised. Dublin Airport Campus contains vacant brownfield development sites that can be mobilised quickly and easily to provide readily available employment floor space with good access to public transport, which includes the future Metrolink. Further to this, the location of the airport within striking distance of the population centres of Swords, as well as the north fringes of Dublin City, such as Santry and Ballymun, highlights its potential in this regard.

daa therefore respectfully request that the proposal to recognise the non-aviation related economic potential of Dublin Airport is reconsidered to support the contribution that Dublin Airport can offer and that the following amendment is made:

daa amendments to suggested 'New RPO – Swords'	Ref. point
<i>Recognise and support the wider Swords-Dublin Airport area as a key location for airport-related economic development, employment provision and opportunities, through the protection and enhancement of access to Dublin Airport lands, including the delivery of MetroLink.</i>	29

RECOMMENDATION 2: SUPPORT FOR AIRPORT GROWTH IN THE MASP

Amendments to Section 5.3: Guiding principles for growth of the Dublin Metropolitan Area

Principle 1 – Dublin as a Global Gateway

The Draft EMRSES provides support for the growth of Dublin Airport to positive effect in Section 8.5 where it is stated that this regional policy will:

“Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin airport...” (Proposed Material Amendments version of the Draft EMRSES, March 2019)

This policy confirms the strategic role of Dublin Airport in the growth of international connectivity. It also provides support for the infrastructure required to achieve this.

In our latest submission, daa requested that airport growth is also recognised in Chapter 5 Dublin Metropolitan Area Strategic Plan (MASP), given the critical function of the MASP in addressing long term strategic development issues (NPF 2018, page 134). It is noted that ‘Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area’ has been amended to reflect submissions received.

daa welcome this amendment but wish to reinforce the importance of having strong support at a regional level for the infrastructure required to enable the continued growth of Dublin Airport. Support for the infrastructure is central to realising this growth in terms of passengers and air traffic movements in line with industry requirements.

It is recognised that efforts have been made to further summarise these guiding principles, however, given the national importance of Dublin Airport and its growth, daa request that this guiding principle is strengthened as set out below.

daa suggested amendments: Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area	Ref. point
<i>Dublin as a Global Gateway</i> – <i>In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements. Support international connectivity through growth of Dublin Airport in terms of passengers and air traffic movements in line with industry requirements.’</i>	68

RECOMMENDATION 3: AIRPORT SAFEGUARDING

Amendments to Section 8.5 International Connectivity

daa welcome the amendment made to the below policy (RPO 8.17). In respect to the safeguarding of Dublin Airport, daa also sought the inclusion of a policy which related to ensuring aviation safety.

In addition to the monitoring applications located within airport noise and public safety zones, daa also monitor planning applications to ensure that development within close proximity to Dublin Airport will not affect the safe navigation of aircraft in flight in respect to the following threats:

- Bird hazard
- Glint and glare impact
- Intrusion into Obstacle Limitation Surfaces and/or interference with navigational aids.

daa accept the position taken by the Director and agree that it is the function of the planning authorities to determine whether a development proposal, and its specific set of circumstances, accords with the Development Plan.

It is however, not unusual for conflicting policies to co-exist within a Development Plan – for example, while the development of riparian buffers and certain Sustainable Urban Drainage

(SUDS) measures have potential to support biodiversity and improve drainage measures, the increase in wildlife arising from these measures can serve to further attract birds of prey and inadvertently pose threats to aviation safety making such policies with the vicinity of Dublin Airport incompatible with other Development Plan policies relating to safeguarding the safe and sustainable operation of the national airport.

On this basis and taking account of the Director's comments, a suggested amendment to RPO 8.17 is proposed. It is considered that the proposed wording acknowledges and reflects the role of the RSES as a strategic policy document that shapes plan-making and decision-making from a regional level.

daa further suggestion for RPO 8.17: Section 8.5 International Connectivity	Ref. point
<i>Spatial planning policies in the vicinity of the airport shall protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses. Policies 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>	118

SUMMARY AND CONCLUSION

Dublin Airport is strategically important and its growth is critically linked with the Irish economy. This is well represented within the Draft EMRSES and further strengthened by the Proposed Material Amendments made to the Draft EMRSES.

Whilst daa have requested certain further policy revision in relation to ensuring the safety of aircraft in flight, we acknowledge that the EMRSES provides a strong policy framework for the protection and growth of Dublin Airport.

This submission therefore seeks to secure a stronger policy basis for aviation safety and greater recognition for the role of Dublin Airport in non-aviation related economic development.

Should you require any further information, please do not hesitate to contact us.

Yours faithfully,

pp E. Donnelly

Yvonne Dalton

Group Head of Planning

Appendix 1: Summary Table of Recommended Draft EMRSES Amendments

EMRSES RECOMMENDATIONS	Ref. Point
<p>RECOMMENDATION 1: EMPLOYMENT AT DUBLIN AIRPORT</p> <p>Amendments to Section 4.6 Key Towns</p> <p>‘New RPO – Swords’ - <i>Recognise and support the wider Swords-Dublin Airport area as a key location for airport-related economic development, employment provision and opportunities, through the protection and enhancement of access to Dublin Airport lands, including the delivery of MetroLink.</i></p>	29
<p>RECOMMENDATION 2: SUPPORT FOR AIRPORT GROWTH IN THE MASP</p> <p>Amendments to Section 5.3: Guiding principles for growth of the Dublin Metropolitan Area</p> <p><i>Dublin as a Global Gateway – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements. Support international connectivity through growth of Dublin Airport in terms of passengers and air traffic movements in line with industry requirements.’</i></p>	68
<p>RECOMMENDATION 3: AIRPORT SAFEGUARDING</p> <p>Amendments to Section 8.5 International Connectivity - RPO 8.17</p> <p><i>Spatial planning policies in the vicinity of the airport shall protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses. Policies 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>	118