

15th October 2019

Senior Executive Officer Planning and Strategic Infrastructure Department Fingal County Council County Hall Main St Swords Co. Dublin K67X8Y2

Re: Draft Dublin Airport Local Area Plan 2019

A Chara,

Thank you for your authority's work in preparing a comprehensive local area plan for Dublin Airport.

The Office of the Planning Regulator has assessed the draft Local Area Plan (LAP) above under the relevant provisions of the Planning and Development (Amendment) Act 2018 and under which the Office of the Planning Regulator (OPR) was established on 3rd April last.

As your authority will be aware, one of the key functions of the OPR includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

The Office is currently developing an overall assessment methodology for statutory plans. The submission below has been prepared to provide a high-level input to your authority in finalising the plan.

1. Consistency with the Hierarchy of Statutory Plans

Statutory observations and recommendations from the OPR are aimed at ensuring broad policy consistency between national, regional and local levels of the statutory planning policy hierarchy, which in the case of the proposed draft LAP will include the National Planning Framework (NPF) Regional Spatial and Economic Strategy (RSES) and your authority's county development plan, including its core strategy.

The draft Local Area Plan takes account of the relevant National Strategic Outcomes and National Policy Objectives under the NPF, including NSO4 relating to the strategic importance of Dublin Airport in relation to international connectivity and the progression of a programme of infrastructural enhancements in the pursuit of that objective, and NPO 65 relating to pro-active management of noise.

The draft LAP has also been published subsequent to the making of the Eastern and Midland Regional Assembly RSES, as acknowledged in the draft LAP, which further develops and applies the policies of the National Planning Framework (NPF) at regional level.

The RSES provides strategic direction for the formulation of subsequent county/city development plans and a further context for alignment of plans at national, regional and local levels. Relevant RSES objectives relating to Dublin Airport include, inter alia;

- (RPO 8.17) the support of the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport in its status as a secondary hub airport;
- (RPO 8.18) the support of improved access to Dublin Airport, including Metrolink, BusConnects and cycling accessibility, in addition to connections from the road network from the west and north and appropriate levels of car parking; and
- (RPO 4.31) the support of Swords-Dublin Airport as a key location for airport related economic development and employment provision linked to the protection and enhancement of access to Dublin Airport lands including the delivery of Metrolink.

In addition the RSES, the Dublin Metropolitan Area Strategic Plan recognises the need to protect and improve access to Dublin Airport as a key growth enabler for Dublin City and Metropolitan region.

It an objective (ED1) of the LAP to ensure an appropriate balance between the economic and employment potential of the airport with protection of its core operational function, while (ED2) limiting non-air transport related office development until the identified required roads infrastructure is in place and public and sustainable transport, such as the Swords Core Bus Corridor (CBC, as referred to in the South Fingal Transport Study, Final Report, February 2019) and Metrolink are operational, are consistent with the provisions of the RSES.

Such a policy approach is consistent for now with the compact growth objectives of the NPF. However further consideration will be required around the appropriate level of any non-air transport related office development in and around the airport complex in the future Fingal Development Plan and in the next iteration of the LAP. Such consideration would need to take account of any impacts on overall metropolitan development and the demands placed on enhanced connectivity, allowing for wider economic, demographic and mobility trends ahead, in addition to the need to for the ongoing protection of the core operational function of the airport and the capacity of surface access thereto In the meantime, the LAP recognises the existing deficiencies in surface access infrastructure serving Dublin Airport and proposes measures (under chapter 8) to address same, including objectives relating to external road network access (EA1-EA12), cycle facilities (CY1 and CY2), public transport (PT1-PT13), internal access (IA1-IA5), mobility management (MM1-MM4) and car parking (CP1-CP7).

In general, it is considered that the LAP is consistent with the provisions of the RSES. The Office suggests, however, that the wording of objective ED2 could be amended to more clearly tie the accommodation of future development on HT-zoned lands to the implementation of the full range of specific measures and objectives proposed under chapter 8 of the LAP, and to also specify the detailed assessments (transport assessment, ABTA) and related proposals (mobility management plans), etc., required to accompany applications for development, in order to ensure the protection of the core aviation function of Dublin Airport.

Whilst your authority will be aware of the requirement to undertake a review of the Fingal Development Plan 2017-23 in order to determine whether it is consistent with the adopted RSES and to commence any variation to the plan or the preparation of a new plan as appropriate to ensure consistency, given the specialised nature and detail of the draft LAP, it is not anticipated that any such a variation will prompt a subsequent review of the local area plan concerned.

The Office notes, in particular, the provisions of the Development Plan concerning Dublin Airport that have been reflected in the draft LAP. These include the following objectives:

- (ED30) to ensure that Dublin Airport is developed and promoted as a secondary hub;
- (ED31) 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; and
- (ED32) to ensure an appropriate balance is achieved between developing the unique potential of Dublin Airport as an economic generator and major employer in the County and protecting its core operational function as the Country's main international airport.

Accordingly, the Office considers the draft LAP to be consistent with the core strategy and objectives of Fingal Development Plan 2017-2023 and with the hierarchy of plans.

2. Consistency with the NTA Transport Strategy for the Greater Dublin Area

Your authority should satisfy itself and through engagement with the National Transport Authority that the proposed Variation is consistent with the *Transport Strategy for the GDA 2016-2035*.

3. Compliance with Ministerial Planning Guidelines issued under section 28 of the Act

The Planning Regulator is satisfied that the proposed draft Local Area Plan is consistent with the relevant section 28 guidelines, including the *Local Area Plans Guidelines for Planning Authorities* (DEC&LG, 2013).

<u>Summary</u>

The Planning Regulator has no comment on the proposed Draft Dublin Airport Local Area Plan.

Your authority is required to notify this Office within 5 working days of the making of the local area plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with a recommendation of the Office, or otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Such notice requirements enable the Office to consider the matters further as regards the making of any recommendations to the Minister in relation to the provisions of Sections 31AO and 31AP of the Act.

Please feel free to contact the staff of the OPR in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at <u>plans@opr.ie</u>.

Is mise le meas,

Gong Byan

Gary Ryan Director, Office of the Planning Regulator

076 100 2747 gary.ryan@OPR.ie