

Mr. Jim Conway
Director
Eastern & Midland Regional Assembly
3rdFloor North
Ballymun Civic Centre
Main Street
Ballymun
Dublin
D09 C8P5

12 April 2019

Re: Eastern & Midland Regional Assembly - Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019-2031

Dear Jim,

1.0 Introduction

In January 2019, Future Analytics Consulting Ltd., Chartered Planning and Development Consultants, made a submission on behalf of Tri-Aviation Project Co. Ltd. ('Tri-Aviation'), [REDACTED] to the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region. Tri-Aviation commends the Eastern and Midland Regional Assembly (EMRA) for giving due regard to this submission and the progress outlined in the current proposed Material Amendments to the Draft RSES.

The present submission reaffirms the views outlined in Tri-Aviation's earlier submission, a copy of which is enclosed for convenience. In addition, we outline herein a number of practical refinements which we submit represent necessary and appropriate improvements to the proposed material amendments currently on public display.

2.0 Background context

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 has been 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, the absence of same would fail to deliver a future proofed transport network, hampering growth of the airport and stifling economic growth prospects for the country.

3.0 Proposed material amendments

The proposed material amendments have been carefully considered by Tri-Aviation, and the following sections outline some practical yet important refinements which should be considered by EMRA and included in the forthcoming RSES.

3.1 Amendment to Strategic Vision

Chapter 2: Strategic vision

3. Amend RSO 15 Enhance Strategic Connectivity to read as follows:

- *Protect and enhance international connectivity and regional accessibility to support economic development, build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism.*

Tri-Aviation submit that the RSO 15 should be refined further, to state:

3. Amend RSO 15 Enhance Strategic Connectivity to read as follows:

- Protect and enhance international connectivity and regional accessibility, **as advocated and provided for within the National Planning Framework**, to support economic development, build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism.

RATIONALE: It is submitted that the National Planning Framework as the principal policy instrument in the national policy hierarchy, specifically endorses the future provision of western access to the overall Dublin Airport campus, and that the RSES must advocate such infrastructural delivery. This has a direct role in safeguarding Dublin Airport's role as Ireland's gateway to the global economy, while also aligning with the regional and county-level strategic planning objectives for future sustainable planning and development pursuits.

3.2 Amendment to Growth Enablers

Section 3.2 Growth Enablers

6. *New Growth Enablers for the Region, to read as follows:*

- 1. Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity*
- 2. Support the future success of Dublin as Ireland's leading global city of scale by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness*
- 3. Deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin's sustainable growth*

Tri-Aviation submit that the following refinements should be included:

Section 3.2 Growth Enablers

6. New Growth Enablers for the Region, to read as follows:

- Promote global connectivity and regional accessibility as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity. **The unique strategic importance of Dublin Airport as Ireland's gateway to the global economy is recognised and connectivity and accessibility to regional and national transport corridors and to international markets will be carefully safeguarded**
- Support the future success of Dublin as Ireland's leading global city of scale by better managing **the interconnectedness of its** strategic assets to increase opportunity and sustain national economic growth and competitiveness
- Deliver strategic development areas identified in the Dublin Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands to support Dublin's sustainable growth. **A priority strategic development area will include the western campus of the Dublin Airport 'box', thereby futureproofing this strategic asset of national importance**

RATIONALE: It is submitted that one of the most important infrastructure assets in the State, let alone the Eastern Region, is Dublin Airport, which provides Ireland's primary platform and gateway to the global economy. It has long been held that the plan-led development of Dublin Airport must include development of the western campus lands, as endorsed in the Dublin Airport Local Area Plan (presently being reviewed) and the National Planning Framework specifically calls for future western road access to the Dublin Airport 'box'.

3.3 Amendment to Growth Enablers for City and Metropolitan Area

7. Amend Growth Enablers for Dublin City & Metropolitan Area, expand enablers to read as follows:

...

6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus the Dublin-Belfast Corridor.

Tri-Aviation submit that the enabler above is modified to read:

7. Amend Growth Enablers for Dublin City & Metropolitan Area, expand enablers to read as follows:

...

6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus the Dublin-Belfast Corridor **and those projects identified within the National Planning Framework and National Development Plan.**

RATIONALE: It is submitted that the National Planning and National Development Plan provide key policy direction and vision for major investment in infrastructure over the next 10- and 20-year horizon periods.

3.4 Amendment to Key Towns

Section 4.6: Key towns

29. New RPO – Swords

Support 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.

Tri-Aviation propose the following alternative wording:

29. New RPO – Swords

Support Swords-Dublin Airport as a key location for **economic development and employment provision to supplement the foreseen development of the western campus of the Dublin Airport 'box'**, linked to the protection and enhancement of access to Dublin Airport lands **by a western access road (as set out in the National Planning Framework) and the timely** delivery of Metrolink

RATIONALE: It is important that Fingal County Council-adopted planning policy, including the Dublin Airport Local Area Plan 2006-2015 (presently under review), is respected and aligned with. In addition, it is critical that the RSES complies with the National Planning Framework which seeks western road access to Dublin Airport.

3.5 Amendment to Dublin MASP Guiding Principles

Chapter 5 Dublin MASP Section 5.3 Guiding Principles for the growth of the Dublin Metropolitan Area

68. Amend Guiding Principles. Further summarised to read as follows:

1. *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.*

Tri-Aviation strongly contend that the guiding principle should be amended to:

1. Dublin as a Global Gateway – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport (**focussed on the designated western campus lands**) and Dublin Port (**focussed on the Dublin Port Masterplan vision**), to protect and improve existing access and support related access improvements.

RATIONALE: It is submitted that the RSES must serve as a clear regional strategy by outlining the key strategic development zones suited to accommodating the future development and consolidation of primary gateway infrastructure within the Dublin Region.

3.6 Amendment to Employment Generation

Section 5.8 Employment generation

76. New Guiding Principles for the location of strategic employment. Include a high-level summary of Section 6.3 Guiding Principles, to read as follows:

The Economic Strategy sets out Guiding Principles for the location of strategic employment areas that include access to;

- suitable locations (depending on the extent to which an enterprise is people or space intensive);*
 - serviced sites (based on whether an industry is dependent on a particular infrastructure such as energy, water, transport or communications networks);*
 - connectivity (including access to international markets that requires proximity to an airport/port);*
 - skilled labour force (proximity to third level education and lifelong learning) and*
 - local strengths (a diverse sectoral mix, emerging clusters or cross industry value chains),*
- See Section 6.3 for full list of Guiding Principles.”*

Tri-Aviation commends EMRA on the inclusion of the guiding principles outlined above.

3.7 Amendment to International Connectivity

Section 8.5 International Connectivity

116. Amend RPO 8.15 – Dublin Airport

Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport to include its status as a secondary hub airport. In particular, support the provision of a second runway, improved terminal facilities and other infrastructure.

117. Amend RPO 8.16 – Dublin Airport

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 car parking and car hire parking.

118. Amend RPO 8.17 – Dublin Airport

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.

Tri-Aviation submit that the following adjustments are warranted:

Section 8.5 International Connectivity

116. Amend RPO 8.15 – Dublin Airport

Support the National Aviation Policy for Ireland, **and associated studies and guidance by the Department of Transport, Tourism and Sport**, and the growth of movements and passengers at Dublin Airport to include its status as a secondary hub airport. In particular, support the provision of a second runway, **new/improved** terminal facilities and other **connecting and operational** infrastructure.

117. Amend RPO 8.16 – Dublin Airport

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~~ **new road access 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 car parking and car hire parking.

118. Amend RPO 8.17 – Dublin Airport

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.

RATIONALE: It is important that the RSES has due regard to detailed and evidence-led studies, including those commissioned by the Department of Transport, Tourism and Sport, statutory land use planning policy adopted by Fingal County Council and the provisions of the National Planning Framework (the latter advocates for western access to Dublin Airport, for example).

4.0 Conclusion

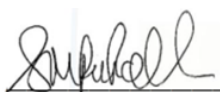
Tri-Aviation, as the owners of a key landholding within the Western Campus at Dublin Airport, would like to commend the EMRA on the preparation of a robust strategy for the spatial and economic development of the region over the plan period. Tri-Aviation's lands within the Western Campus have been identified 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.

Tri-Aviation respectfully requests that EMRA consider the above contributions and incorporates these adjustments into the forthcoming RSES for adoption.

Should you require any further information on the foregoing, please do not hesitate to contact the undersigned.

Yours faithfully,



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Director
Future Analytics Consulting Ltd.

Enclosures:

Tri-Aviation Project Co. Ltd. submission to EMRA on Draft RSES, January 2019