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**NPF Submissions  
Forward Planning Section  
Department of Housing, Planning  
Community and Local Government  
Custom House  
Dublin 1  
D01 W6X0**

09<sup>th</sup> November 2017

2.2.01.05 Draft NPF Submission

**Re: Submission to Draft National Planning Framework**

Dear Sir/Madam

We welcome the publication of the draft document *Ireland 2040 - Our Plan*.

In our original submission in March of this year, we requested that the following be considered in the development of the National Planning Framework (NPF):

- That the positive role of the Dublin city-region be acknowledged and supported in the NPF;
- That aviation be integrated into the NPF through an objective to support continued growth in connectivity at Dublin Airport;
- That Dublin Airport be designated as an Airport Economic and Employment Zone; and for
- Provision of an implementation plan which prioritises key enabling infrastructure.

**An Bord Stiúirthóirí | Board of Directors** Pádraig Ó Ríordáin - Cathaoirleach/Chairman, Niall Greene, Patricia King, Colm McCarthy, Des Mullally, Barry Nevin, Eric Nolan, Paul Schütz (German), Denis Smyth, Gerry Walsh, Dalton Philips – Príofhfochtfeannach/Chief Executive

**Oifig Chláraithe:** Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. **Uimhir Chláraithe:** 9401 Éire  
**Registered Office:** Dublin Airport, Co. Dublin. **Registered Number:** 9401 Ireland

We welcome the broad acknowledgement of these issues in the draft NPF. We request that the following items be addressed in the final approved NPF.

- 1. That aviation be integrated into the NPF through an objective to support continued growth in connectivity at Dublin Airport.**

The draft NPF contains the following statement with respect to the development of airports, and Dublin Airport in particular:

*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 and particularly in public transport terms such as through the Metro-North project in Dublin. Careful land-use management of land side areas to focus on the current and future needs of the airports.<sup>1</sup>*

We welcome the acknowledgement that as connectivity and passenger numbers grow infrastructure and facilities will be required at the airport to serve such growth. We request that this objective be preceded by a clear and unambiguous objective that supports growth in connectivity at Dublin Airport.

**Recommendation 1**

We request the inclusion of the following objective in the final adopted NPF:

*Facilitate the growth of connectivity (destinations and frequencies) at Dublin Airport.*

- 2. That Dublin Airport be designated as an Airport Economic and Employment Zone.**

Dublin Airport and its environs is in transition from a largely brownfield site in some state of obsolescence just over a decade ago, to a forward looking metropolitan destination which is one of the best connected sites for all modes of transport in the country. Despite this, the draft NPF risks repeating omissions of earlier spatial strategies where the true economic value of the airport may be overlooked. Page 50 of the draft notes:

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<sup>1</sup> Ibid, p.134.

- *Regional and Local Authorities will identify and quantify locations for strategic employment growth in the cities identified on Table 3.1.*<sup>2</sup>

Table 3.1 refers to 'Dublin - City and Suburbs'. In this, there is a risk that Dublin Airport, including its 17,000+ employees will be over-looked for its true economic potential and capacity for further employment due to its lack of 'urban status'. Dublin Airport does not easily fit under a category of suburb.<sup>3</sup> The assumption that all urban development is associated with an immediate residential catchment has potential to leave the national airport without a recognised 'development' boundary. It is therefore requested that Dublin Airport be recognised in the same way that the docklands were in the early '80's for their potential to become a site of even greater economic potential than at present. The designation of Dublin Airport as a national economic and employment centre will complement nearby settlements such as Swords which is forecast to grow exponentially over the Plan period. We therefore re-iterate our request that Dublin Airport be recognised as a site of national economic and employment importance.

#### **Recommendation 2**

Include the following under the title *Key future growth enablers for Dublin include* (p.53):

Determining a limited number of accessible locations for significant people-intensive employment to complement the city-centre and docklands areas *such as at Dublin Airport.*

### **3. Provision of an implementation plan which prioritises key enabling infrastructure.**

There is a strong emphasis in the draft NPF on the feasibility and deliverability of the Plan. It is noted that the provisions of the Plan will be linked to a *National Investment Plan.*

We note that page 53 of the draft NPF outlines the key enablers required for the growth of Dublin City. We welcome this inclusion of improved access to Dublin Airport.

Dublin Airport welcomes all forms of accessibility to Dublin Airport and participated in the National Transport Authority's (NTA's) examination of transport options for Fingal/North Dublin<sup>4</sup>. The outcomes of this report, which include endorsement of a new

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<sup>2</sup> Ibid, p.50.

<sup>33</sup> Oxford English Dictionary, suburb: *An outlying district of a city, especially a residential one.*

<sup>4</sup> Fingal/North Dublin Transport Study, NTA, 2014.

metro north, were subsequently adopted into the Greater Dublin Area Transport Strategy 2016-2035. It is imperative that the new metro north now moves on to the planning and delivery stages.

Inclusion of heavy rail access to Dublin Airport, does not currently form part of the long-term transport strategy for the Greater Dublin Area. It's inclusion in the draft NPF should be carefully considered to ensure it does not conflict with or prejudice delivery of other projects, such as new Metro North or other airport projects, which are recommended and included in adopted transport strategies.

### **Recommendation 3**

Replace the following Dublin enabler:

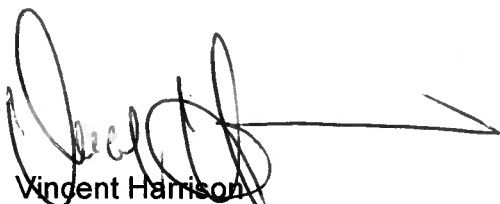
*Improving access to Dublin Airport, to include improved public transport access, connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification.<sup>5</sup>*

with the following:

*Improving access to Dublin Airport, to include improved public transport access and connections from the road network.*

We would also like to understand what road proposals are envisaged to Dublin Airport from the west and north.

In conclusion, we welcome the publication of the draft NPF document which seeks in its own words to provide a spatial expression of national policy, national guidance and national priorities. Please do not hesitate to contact us should you have any queries or clarifications on any of the above.



**Vincent Harrison**  
**Managing Director, Dublin Airport**

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<sup>5</sup> Ireland 2040; Our Plan – National Planning Framework, p.53.

## **Summary**

**Recommendation 1** – Inclusion of the following new objective:

Facilitate the growth of connectivity (destinations and frequencies) at Dublin Airport.

**Recommendation 2** - Include the following under the title *Key future growth enablers for Dublin include:*

Determining a limited number of accessible locations for significant people-intensive employment to complement the city-centre and docklands areas *such as at Dublin Airport.*

**Recommendation 3** - Replace the following Dublin enabler:

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 from the national rail network in the context of potential future electrification.<sup>1</sup>

with the following:

*Improving access to Dublin Airport, to include improved public transport access and connections from the road network.*

**Clarification 1** – Clarity is required on the extent and scope of proposals envisaged in the following statement:

*Improving access to Dublin Airport, to include improved public transport access, connections from the road network from the west and north.*