CHAPTER 4: RECOMMENDED POLICIES

This chapter sets out recommended policies which the consultant team propose should form the basis of variation to the approved County Development Plan. The policies are grouped by main topic, broadly following the order in which they are dealt with in subsequent chapters of the report. Each policy section is cross-referenced to the Analysis chapters (Part 3), which underpin the consultants' recommendations. Where relevant, reference is also made to the new (July 2004) Draft Fingal Development Plan 2005-2011, shown as [DFDP].

4.1 Key recommendations flowing from the vision

Figure 4.1 sets out the suggested land use and other notations, which follow from this logic. Four particular recommendations are worthy of note:

Land south of the airport – airport uses: The recommended Designated Airport Area (DAA) does not embrace the new cargo handling facility south of the main runway proposed by Aer Rianta. The consultant team understands Aer Rianta's case for this facility, but does not find it sufficiently persuasive to justify allocation of land south of the runway for this specific use, particularly given that airport related development can be adequately accommodated within the boundaries of the parallel runways and terminal approach roads (Chapter 5, 5.4.4, 5.5, 5.6). If Aer Rianta wishes to proceed with this proposal, it should be on the basis of a planning application, which has no particular support in the evolving County Development Plan.

Land south of the airport – other uses: Land between the southern runway and the M50 should not be released for further development until the capacity of the whole transport system in this locality has been substantially augmented. Existing road capacity is already a major concern along this section of the strategic network, and significant additional loading should be avoided unless there is a compelling need. Maintaining access to the airport must be a top priority. Strategic and national policy guidance clearly link any new development locations to transport demand and capacity - they must be "contiguous to existing areas and to public transport". This location does not meet those criteria at present, and other locations where airport-related development can be accommodated, notably in Swords and Blanchardstown, already exist.

In the longer term, high-density employment development around a public transport (Metro) node in this area, and some consolidation of the logistics uses to the west, could however be envisaged. The case should be reviewed once Metro implementation is committed. There might then be potential to develop a high-density node of activity around a transport interchange – not a car-oriented business park. The physical extent of development could be defined by a reasonable walking catchment of the interchange (say 500m). Uses could include a mix of airport-related office development (adjacent to the interchange) and airport-related general industry (to capitalise on the transport system and local skills), and possibly hotels and restaurants. (Chapter 7, 7.7; also DFDP p.47 DA011).

Transport route reservations: The importance of the transport issue – coupled with the plethora of transport proposals, particularly rail options – means that the consultant team has had to tread a careful path between allowing for highly flexible long-term planning and sterilising large swathes of the study area with possible rail alignments. Figure 4.1 shows the recommended Metro alignment; policy recommendations also stress the crucial role for Metro. This is strongly endorsed in the new Draft Plan. (DFDP p.99 objective TO6). (Chapter 6, 6.4.2, 6.8.1; and Chapter 5, 5.4.5)

St. Margaret's: The recommendation is to work together with residents to achieve significant incremental change, an approach which would ultimately completely alter the settlement's character. This approach should seek to achieve a consensus among residents – this may be very difficult to achieve, unless most residents already accept the encroachment of the airport as more or less inevitable (Chapter 9, 9.4.2). This approach should be explored through further consultation with local residents and landowners.

Some of the policy recommendations are new, derived from the work carried out by the consultant team; these are indicated by a reference in brackets. Others are drawn directly from the approved County Development Plan, and are included to ensure a comprehensive scope of planning policy covering the study area; these are indicated by a CDP reference in italics and bracketsFigure 4.1 gives a spatial basis for the suggested policies.

4.2 Policy recommendations: The airport

- 4.2.1 The future expansion of Dublin Airport and associated development should take place within a Designated Airport Area (DAA), an approximate proposed boundary of which outlined is on Figure 4.1. Within this area, only confirmed airport-related uses (i.e. those uses that need to be on or near the airport) should normally be permitted. (Chapter 5, 5.6.2 and Table 5.5; see also DFDP Table 4.4 p 44, and Map Sheet No 9)
- 4.2.2 Fingal County Council should work with Aer Rianta, and in consultation with local stakeholders, to prepare a comprehensive long-term Airport Action Plan for the DAA, to specify the proposed disposition and mix of land uses, their location and development phasing. The Action Plan should be based on agreed forecasts of increase in passenger and freight throughput, and provide an indicative land use budget for key major activities. Once adopted by the Council, the Action Plan would be used as the principal development control tool and all future development within the DAA would be expected to accord with it. (Chapter 5, 5.6.2, 5.9.2; see also DFDP p.43 objective DA01).
- 4.2.3 The consultants support the proposal for a second east-west runway. The Action Plan should include the proposal for the second runway and should encourage its development to be operational by the end of this decade. (Chapter 5, 5.2.2, 5.4.2, 5.9.1; also DFDP p43 objective DA02).
- 4.2.4 The Action Plan should include provision for a second passenger terminal. The consultants' view is that the Council should actively encourage development of a second terminal on the western part of the DAA, between the two parallel runways. The exact threshold at which this facility is needed should be determined in the Action Plan. This should be provided when required by market conditions taking account of the required utilisation of the existing facilities. (Chapter 5, 5.9.1).
- 4.2.5 The number and timing of flights on the cross-runaway should be limited to minimise the extent of environmental intrusion to the residents beneath the flight path. Until new runway capacity is provided, there may well be a need for some use of cross-runway 16/34, to maintain airport performance. But the runway's ultimate closure should not be ruled out in any study of longer-term options for

- optimising terminal layout (Chapter 5, 5.4.1, 5.4.2, 5.4.3, 5.9.2, 5.9.3). In any event, after the parallel runway is opened, movements on the cross-runway should relate only to emergency situations or in accurately defined weather patterns. (See also DFDP p.43 DA03).
- 4.2.6 Gateway role and quality: All development within the DAA should be of a high standard of design, to reflect the prestigious nature of an international gateway airport, and its location adjacent to Dublin City. An urban design brief should aim to ensure architectural coherence and quality in the airport area. (Chapter 3, 3.2.1 and Chapter 5, 5.9.3; see also DFDP p.17 para 2.5 and p.43 policy DAP8).
- 4.2.7 Safety Zones: The definition of the extent of the safety zones and restrictions to be imposed on land use within the zones have been established in the Public Safety Zones Study produced by consultants ERM. Any development must continue to be in accordance with these and the 'Red Zones' shown on the Development Plan maps, pending final review, and approval by Government, and in the light of advice from the Irish Aviation Authority (Chapter 5, 5.7; also DFDP p.44 policy DAP8).
- 4.2.8 Parking: total long and short term parking supply will need to reach around 30,000 spaces by 2011, with parking provided by private firms as well as Aer Rianta, and with constant efforts to reduce car mode share. (Chapter 5, 5.4.5 and 5.9.1)
- 4.2.9 The Airport Operator should minimise the visual impact of airport-related car parking areas, both within and outside the DAA, and to work with the Council on positive proposals for measures such as landscaping. (Chapter 5, 5.4.5)
- 4.2.10 Minor extension or alteration to existing properties located within the DAA which are not essential to the operational efficiency and amenity of the airport should be permitted, where it can be demonstrated that these works will not result in material intensification of land use. (Chapter 5, 5.6.2)
- 4.2.11 An Airport Consultative Committee, including representatives from local authorities, airport operators and a variety of other stakeholders, should be established to provide a forum in which to discuss environmental issues. (Chapter 5, 5.8 and 5.9.1; see also p.43 Objective DA05, and p.46 Objective DA90).

4.3 Policy recommendations: Surface transportation infrastructure

- 4.3.1 The existing road capacity is a major concern on the strategic roads within the study area. In the short to medium term, the Council should seek to carry out planned improvements to the M1 and M50. (Chapter 6, 6.5; see also DFDP p.96 Objective TO1 and Table 6.1).
- 4.3.2 A second airport western access road may be required from around 2007, due to forecast congestion on the existing eastern access road network, and in association with development of the second parallel runway and the inevitable relocation of airport operations westward within DAA. The design and programming of this needs to be harmonised with both the proposed upgrading of the N2 and the Action Plan to be evolved with Aer Rianta. In addition, future road upgrades may be required on the N32 east of the Turnapin Interchange, are under way on the R108/southern perimeter road north of the Ballymun interchange, and should provide for a largely separate local road network

- between Ballymun/Sillogue and Balgriffin. (Chapter 6, 6.8.5 6.8.11 and Table 6.6).
- 4.3.3 The proposed Metro line runs from the City to Ballymun and then on to the Airport and Swords, and is programmed for construction by 2010. A preferred alignment is shown on Figure 4.1 covering the route between the M50 (Ballymun junction) and the airport terminal. It is vital that this important corridor is not compromised and any development in the area of search should have neutral impact on potential alignments and preferably complement them. (Chapter 6, 6.8.and 6.4.2)
- 4.3.4 Possible heavy rail links and light rail (Luas) routes to serve the airport would be major additions to the airport transport infrastructure. Any proposals would need to complement the proposed Metro alignment and programming of implementation. The consultants support the connection of Dublin Airport to the larnród Éireann network, but any proposals should be considered on their merits. (Chapter 6, 6.4.3, 6.4.4, 6.8.1, 6.8.3). The priority of Metro is however reemphasised: a clear and speedy decision to proceed is vital to the efficient functioning of the area.
- 4.3.5 The Airport Action Plan, developed in consultation with Aer Rianta, should address the routing, alignment and integration of public transport facilities within the airport complex. This should include proposals for bus priority lanes, a dedicated public transport terminus, and the potential for Advanced Passenger Movement technology within the Airport (Chapter 5, 5.4.1, 5.6.2).
- 4.3.6 Bus services and infrastructure should continue to be improved. The development of Metro should not be seen as a replacement for bus services, but rather as complementary to them. New development in the study area should incorporate measures that support bus use. (Chapter 6, 6.4.5, 6.8.4).
- 4.3.7 The Council should continue to promote park & ride facilities at suitable public/private transport interchanges. (DFDP p.100, Objective TO15).
- 4.3.8 The Council should promote walking and cycling, and encourage the provision of cycleways and wheelchair-friendly footpaths associated with any new development. Pedestrian and cyclists rights-of-way should be laid out to maximise safety and deter nuisance. Where practical, cycle routes should link into the strategic County cycle network. (CDP p.82-83; DFDP p.102 Policies TP 22-24).
- 4.3.9 Where appropriate, the Council should require Mobility Management Plans to accompany planning applications. (CDP p.75; DFDP p.100 Objective TO16).

4.4 Policy recommendations: Commercial development

- 4.4.1 In the short term there should be a presumption against commercial development within the study area (apart from airport-related commercial development within the DAA, sites already zoned in the Development Plan and minor additional zonings for logistics use which consolidate existing zonings) (Chapter 5, 5.6.2 and Chapter 7, 7.7).
- 4.4.2 The proposed Metro route south of the main runway can be regarded as fixed, creating the potential in the longer term for a high-density, employment-intensive

- development node around a multi-modal transport interchange. The development should be orientated around public transport, and the physical extent of the development should be determined by a reasonable walking-distance catchment to the public transport interchange (say 500m radius). (Chapter 7, 7.7 and Figure 7.6; also DFDP p.47 objective DAO11).
- 4.4.3 To the west of the high-density node, some consolidation of the existing logistics uses would be appropriate, subject to low employment densities which do not risk compromising transport network performance (Chapter 7, 7.7.3).
- 4.4.4 Intensification of existing industrial premises along Swords Road should be permitted within the existing curtilages, where such development contributes to the consolidation and environmental improvement of the area. Commercial development should not be permitted outside existing development envelopes. (Chapter 7, 7.7; and DFDP p.47 Policy DAP 18).
- 4.4.5 Such intensification should only be permitted where it can be demonstrated that it will improve the quality of the physical environment of the area. The County Council should be looking for proposals which show that development of this kind is also helping to fund the environmental upgrade of surroundings. Planning applications for extensions to industrial premises should be accompanied with design statements, which demonstrate compliance of the proposal to high quality landscaping, quality architectural treatment and their gateway location. (ibid).
- 4.4.6 There should be a presumption against any further retail development within the study area (apart from airport passenger-related retail provision see 5.3 and 5.6.2). In accordance with approved national and regional retail planning guidance, and the County Retail Strategy (DFDP 2.4), additional retail development should be located within established or planned town centres, where retail provision can best serve the local community. (Chapter 7, 7.6.5)
- 4.4.7 The type, quantum and location of retail provision within the airport should be identified in the Airport Action Plan, and be directly linked to passenger throughput and restricted to the needs of airport staff and users. (Chapter 7, 7.6.5, and Chapter 5, 5.6.2)
- 4.4.8 Car parks and control of on-street and private off-street parking should be provided in accordance with the approved standards set out in the County Development Plan, and carefully controlled. The special case of airport parking is dealt with above (para. 4.2.9). (CDP p.80;also DFDP pp96-98)
- 4.4.9 The provision of cycle parking facilities should be provided in accordance with the approved standards set out in the County Development Plan (CDP p.83)

4.5 Policy recommendations: Environmental issues

4.5.1 Noise levels due to aircraft noise have been assessed on behalf of Aer Rianta to 2009-10. A further baseline noise study is recommended, with a long-term horizon that takes account of the proposed Airport Action Plan, as well as Fingal CC's objectives for the development area and the forthcoming application of the EU Noise Directive, with its requirements for noise limit values, mapping, information and action plans. A similar study should be undertaken relating to road noise. The Council would need to be reassured about the environmental impact of long-term airport development on the surrounding areas. This should include the potential for increasing night flying, to which residential areas are

- particularly susceptible. (Chapter 8, 8.1.1-8.1.5; see also DFDP p.45 Objectives DA07 and DA08).
- 4.5.2 The consultants endorse the work and recommendations of Aer Rianta's consultants Parkman, but note that its prediction for the impact of cross-runway useage on residential areas south of the Airport rely on a very low percentage of flights using runway 16/34 (2-3% compared with the 8-10% useage at present). With that proviso, it seems sound to adopt the Inner and Outer noise contours in that work, and this is the approach adopted in DFDP (p.45 Policy DAP11 and Map Sheet No 9; see also Chapter 8, 8.1.4 below).
- 4.5.3 Long term monitoring of air quality at the airport and along major roads should continue through the Dublin Regional Air Quality Management unit. As the airport expands the objectives of the Dublin Regional Air Quality Management Plan (DRAQMP) and its monitoring network should be revised to ensure appropriate coverage. Aer Rianta should continue its air quality monitoring and regulation as a contribution to the regional database. (Chapter 8, 8.2.3)
- 4.5.4 Every development proposal in the environs of the airport should take account of current and predicted changes in air quality and local environmental conditions. Where required, this should form part of the Environmental Statement (required in support of any planning application for major infrastructure such as a new runway or terminal). (Chapter 8, 8.2.3; and also DFDP p.45 Policy DAP12).

4.6 Policy Recommendations: Housing

- 4.6.1 The consultants recommend that no further areas are rezoned for residential development within the study area due to noise, safety, airport-related growth and rural policy issues (*Chapter 9, 9.4.1*). This policy should be based upon the study of noise contours and guidance contained within the Public Safety Zones study as adopted by Government (ref. 4.2.7 and 4.5.1-2 above)..
- 4.6.2 Improvement and extension to existing properties in such locations should be permitted where it can be demonstrated that such works do not represent significant intensification of development, and that appropriate consideration of potential noise impacts are incorporated within the proposals. (Chapter 9, 9.4.4)
- 4.6.3 It is recommended that St Margaret's be designated as "St Margaret's Special Policy Area". Further growth and development of the settlement should be determined through consultation with the existing community, Fingal County Council and Aer Rianta. (Chapter 9, 9.4.2; and DFDP p.46 Objective DAO10).
- 4.6.4 The consultants have considered the existing residential areas in and adjacent to Balgriffin, as well as the residential zonings in that locality which were proposed in CDP 1999-2004. Because some of the latter will be significantly affected by the increase in aircraft noise and airport activity, the recommendation is that most should be rezoned for employment uses (Chapter 9, 9.4.3). The new DFDP Map (Sheet No. 9) shows employment zonings consistent with this logic. For the existing residential area of Balgriffin, consolidation may be allowed, but outside this area, all further development should be related to the separation, agricultural, recreational and urban amenity functions of the green belt/rural area zoning. (Chapter 9, 9.4.3)

4.7 Policy recommendations: Community facilities, recreation and the Green Belt

- 4.7.1 It is recommended that Green Belt Status (broadly the current CDP Objective H greenbelt, urban and rural amenity and agriculture areas) should continue to be used to protect the open character of the land to east, north, west and (partly) south of the airport; maintain a physical and visual break between urban areas. The Council should promote recreational and leisure activities within this area for the benefit of the community at large, and continue to foster agricultural uses, (Chapter 10, 10.1.3 10.1.5)
- 4.7.2 The eastern part of the land between the DAA and M50 should continue to function largely as a landscape buffer and rural area in the short to medium term. It is recommended that as part of the continual upgrading and improvement of this area, an environmental improvement/enhancement study is carried out. (Chapter 10, 10.1.5). In the longer term, much of this area has potential to be developed, and so the current objective B (CDP) and proposed Objective RU (DFDP) designations will need to be reviewed in due course (Chapter 10, 10.1.5).
- 4.7.3 New community facilities and services should be permitted according to need and be located within existing local centres to decrease the need for users to travel and to support existing functions. The Council should not normally permit development of community facilities and services outside the developed settlement envelopes of St Margaret's and Balgriffin. (Chapter 10, 10.1.2)
- 4.7.4 Individual trees, groups of trees and woodland which form important landscape features should be protected by management agreements, tree preservation orders, or tree bonds as appropriate, in accordance with the County Development Plan. (CDP p.107)
- 4.7.5 Existing flora and fauna should be conserved through the protection of wildlife habitats wherever possible, in accordance with the County Development Plan. Development adjacent to waterways should be controlled so as to protect waterway wildlife corridors. (CDP p.107)

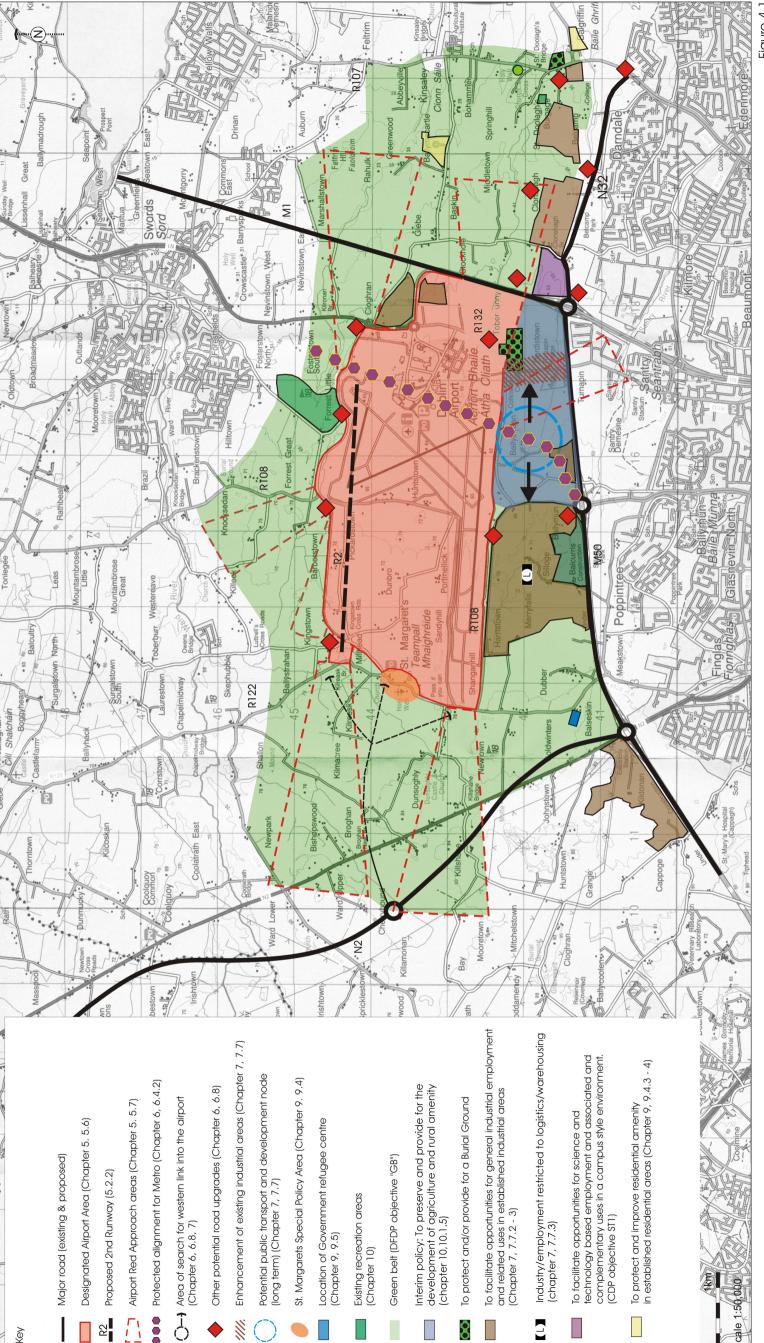
4.8 Policy recommendations: Cultural heritage

- 4.8.1 The Council should promote the protection, appreciation and appropriate revitalisation of the vernacular heritage of Fingal County. The design of new buildings should appropriately consider the existing vernacular heritage. (Chapter 11,11.1.2 11.1.3; and *CDP p.114*)
- 4.8.2 The Council should support the enhancement and active promotion of protected structures and their features and settings, and Architectural Conservation Areas as part of the wider promotion of the heritage of Fingal County. The County should work with Aer Rianta and the local tourism and leisure industry to promote the local heritage of South Fingal. (Chapter 11, 11.1.3 and 11.2)

4.9 Policy recommendations: Other infrastructure

4.9.1. The Council should minimise pollution, provide water supply and drainage facilities to permit development to proceed and make good deficiencies in the piped network. (CDP, p.84)

- 4.9.2. The Council should continue to support water conservation programmes, which to date have been very successful. It should encourage the optimal use of water and reduce leakage and waste wherever possible. (CDP p.84, Chapter 12, 12.1.2)
- 4.9.3. Developers should be required to provide effective and economical drainage systems, with separate surface water and foul sewer systems. They should demonstrate that the proposed system can deliver no net increase in surface water run off, based on an initial 'greenfield' use. Every development scheme area should make provision for the cost implications of measures to attenuate flow. (CDP p.84, Chapter 12, 12.2)
- 4.9.4. The Council should apply objectives for foul sewerage infrastructure to ensure the disposal of waste water in an environmentally sustainable manner. *(CDP p.84*, Chapter 12, 12.3)
- 4.9.5. The Council should continue to reduce and, as far as possible, eliminate areas of flooding risk, and to provide surface water design solutions to enable zoned lands to be developed. Development should be restricted on land liable to flooding. The Greater Dublin Strategic Water Study should be used to assess development proposals against flooding risk, and against the implications on surface water systems. (CDP p.85, Chapter 12, 12.2)



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