



An
Bord
Pleanála

Inspector's Report PC0250

Proposed Development	Continuance of use, on a permanent basis, of: 1) The 8840 space long-term car park 2) The 2040 space long-term car park
Location	Harristown (1) and Stockhole (2), Dublin Airport, Co. Dublin
Planning Authority	Fingal County Council
Prospective Applicant	Dublin Airport Authority
Type of Application	Pre-application consultation
Issue	Whether the proposed project is or is not strategic infrastructure development
Consulted Bodies by the Board	Fingal County Council National Transport Authority Transport Infrastructure Ireland
Inspector	Suzanne Kehely

1.0 Introduction

- 1.1. Dublin Airport Authority is proposing continuance of use on a permanent basis of two separate long-term car parks as part of the airport operation at Dublin Airport. The overall airport lands have an extensive planning history and include a series of separate permissions for car parking in the vicinity of the airport and permission for the development of t Terminal 2 (T2)Terminal site, (which opened in 2010) and which comprehensively addressed the issue of car parking in terms of quantity and type by way of detailed conditions. Subsequent grants of permission have been made within the parameters of this T2 permission and have been mainly temporary in duration with the exception of the some of the red car park spaces being permitted on a permanent basis, (PA0030). This current proposal seeks to increase the number of permanent spaces by retaining the temporary permitted long-term parking.
- 1.2. The first consultation meeting was held on 18th September 2017 with the Dublin Airport Authority and its agents in relation to the proposed development wherein the proposal and its context were explained in detail. The agent is of the opinion that the proposed development does constitute strategic infrastructure. Following some initial discussion of overall car parking for the airport within the context of the cap limitation set by the T2 permission, the applicant submitted further information to the Board.
- 1.3. In order to consider the wider strategic implications for integrated transport and land-use given the particular emphasis now on permanent use of long-term car parking and having regard to the reasons for the conditions originating from T2, the Board decided to meet with Fingal County Council and also the National Transport Authority together with Transport Infrastructure Ireland. Following a series of meetings held on 12th and 13th October 2017, the Board held a second consultation meeting with the prospective applicant on 19th December.

2.0 Site Description

- 2.1. The subject sites relate to two separate extensive surface car park sites which are serviced by shuttle buses to and from the airport.

- 2.2. The larger site is described as Holiday Blue Car Park Site and is 25.1 hectares and it is located to the south west of airport lands in the townland of Harristown on the southern side of the R108 road and to the north of an emerging industrial estate development. There are 8840 car park spaces proposed for continuance of use on a permanent basis. Access is at the eastern end of the R108.
- 2.3. The smaller site is 10.6 hectares and is south east of the airport terminals. It is east of the R132 (Swords Road) and west of the M1. The site includes a car park area for 2040 cars east of Dardistown Cemetery and is the most southern part of the airport lands. It also includes an extensive access road/circulation route. The site is accessed off the Swords Road (R132) via an internal road network serving the Red Express car park of 10,340 spaces in its entirety in addition to industrial premises and extensive car rental car parks/storage. This entrance is 1.2km north of the Dardistown cemetery access along the R132 and is 1.4km from this car parking area along the internal access route at its shortest point.
- 2.4. The total car parking provision for exclusive airport use is stated to amount to 25,425 spaces as provided for in Holiday Blue (8,840), Red Express (10,340) and Quickpark. (6,245). This is within the stipulated cap of 26,800 spaces which was imposed by way of conditions attached for airport Terminal 2.

3.0 The proposed development

3.1. Seeking permanent permission for two temporary car park areas

- 8,840 spaces in the Holiday Blue car park
- 2,040 of the existing 10340 spaces on the Red Express car park. A permission would reverse the condition attached in the case of PA0030 which restricts permanent use of these spaces.
- No works proposed

4.0 Planning History

4.1.1. Holiday Blue site (Harristown):

PA0022 (file attached) refers to a grant of permission on 22nd August 2018 under section 37G for continuance of use of the Harristown/Long-term Blue Car Park at Harristown, Siloge and Ballymun Townlands subject to 9 conditions notably relating to such matters as:

- Temporary permission for 7 years
- Details of drainage and water quality monitoring
- Traffic counting
- Electric car charging point
- Landscaping

The Board noted that in view of the temporary nature of the permission, metro north contribution was not considered appropriate.

4.1.2. **Express Red/Stockhole:**

PA0030 (file attached) refers to grant of strategic infrastructure permission on 5th March 2014 for continuance of use of a long term car park (10,200 spaces) known as Eastlands at Stockhole, Cloghran, Tobercurry, Dardistown Townlands. (The current pre-application site relates to the southern part only of this larger area which was restricted to temporary permission as was the northern part). The conditions attached in this case related to:

- Restricted in the HT zoned land to temporary duration for the stated reason 'having regard to the northern site's zoning objective it's considered appropriate in terms of orderly land use to allow for a future assessment of demand for long-term car parking spaces serving Dublin Airport in light of the circumstance then prevailing.'
- Restricted in the GE zone to temporary permission for the stated reason 'having regard to the southern site's distance from the airport and its general employment zoning objective it is considered appropriate in terms of orderly land-use to allow for a future assessment of demand for long-term car parking spaces serving Dublin Airport in light of circumstances then prevailing'.
- Detailed surface water management details relating to SUDS and also to water quality and discharge rates.

- Traffic counting
- Electric car charging point
- Landscaping
- Illumination/glare

The above application was submitted following the determination by the Board that continuance of use of long-term car park constituted strategic Infrastructure development. (PL06F.PC0156-attached)

4.1.3. **Parent Permission for Terminal 2 and car parking for Dublin Airport generally**

An Bord Pleanála Ref. PL06F.220670 (F06A/1248) refers to a 10-year permission for construction of Terminal 2 in 2007. This permission in particular sets out the parameters for car parking for the airport operation at a strategic level particularly in the context of a Mobility Management Plan and by setting maximum limits. More specifically:

- **Condition 12** relates to Airport Mobility Management, including the provision, management and monitoring of parking;
- **Condition 23** specifies that the provision of parking to serve the development shall be the subject of separate planning applications, as required. It also states that any additional parking provided shall have regard to mode share targets established by the MMP and the growth of passenger numbers. Restrictions, or caps are then specified for all categories of parking, having regard to the assumptions made in the EIS, the MMP and the capacity of Phase 1 of the T2 development;
- **Condition 24** requires that charges for public car parking serving the development shall be agreed, having regard to the mode share targets established in the MMP, the availability of parking and the ongoing implementation of public transport services & infrastructure.

A note prepared by the NTA (in December 2017) summarising key points in the transport element of the EIS and its assessment and underlying assumptions is attached to the file for the Board's convenience. (Appendix II)

4.1.4. **Other:**

- An Bord Pleanála Ref.PL06F.PA0008 refers to permission for a multi-storey car park and hotel.
- An Bord Pleanála Reference Number: 06F.PM0005 (Associated Application Reference Number 06F.PA0008): The proposed alteration relates to the use of the 400 number car parking spaces at Level 01 of the permitted Terminal 2 Multi-Storey Car Park, which are currently designated for hotel use. DAA wish to utilise these car parking spaces for short-term public car parking use pending construction of the hotel. Once the hotel is operational, it is proposed that car parking will be provided for hotel customers within the overall Terminal 2 Multi-Storey Car Park, rather than on one designated floor. the Board hereby refused to make the alteration, based on the stated reason.

Having regard to the existing capacity issues on national routes in the vicinity of the site and particularly the M50 Motorway, to the current and projected future increase in traffic volumes and congestion on these routes and to the level of information presented with the application particularly parking space turnover rates and occupancy levels, and to the lack of clarity with regard to the completion of the hotel element of the permitted development, the Board is not satisfied on the basis of the information available that the proposed alteration would not have a potential adverse impact on the carrying capacity and use of national routes. The proposed development would therefore be contrary to the proper planning and sustainable development of the area and would be premature pending the submission of further detailed assessment of traffic impacts and clarity regarding the timescale for phasing of the remaining elements of the development permitted on site.

5.0 Policy Context

5.1. National Planning Framework

- 5.1.1. High Quality International Connectivity is a Strategic Objective. The development and enhancement of Dublin airport is identified as an objective. In particular, the focus is on development of an additional runway, enhancing access with a particular emphasis on public transport e.g. metro link and careful land use management land-side

- Enhanced airport access together with improvements in bus, DART and LUAS/Metro network as part of Metropolitan Area Strategic Plan for Dublin,
- Improving access to Dublin airport to include improved public transport access, connections from road and consideration of heavy rail access.
- Dublin -Belfast identified as economic corridor - airports identified as having 35 million passengers per annum

5.1.2. Sustainable Mobility is a strategic objective to provide a well-integrated public transport. Private Car dependency and high road usage is identified as an issue.

5.2. National Spatial Strategy and Regional Planning Guidelines

5.2.1. Key relevant strategic airport related policies and objective are cited by the prospective applicant and are referred to in section 7.1 below.

5.3. Fingal County Development Plan 2017-2023

Site/Land	Current zoning	Car parking
Harristown	<p>Car park area – GE Provide opportunities for general enterprise and employment</p> <p>A proposed road route (east/west) runs parallel to and just outside the southern boundary. A proposed light rail route also partially follows this route.</p> <p>Site is part of larger tract of GE land of a large portion is subject to an objective for a Master Plan - MP 11B</p> <p>The site is outside the airport LAP lands.</p>	<p>Neither permitted nor not permitted class but site indicated as car park (CP) in development Plan Map 11. Assessed on merits</p>
Stockpole	<p>Car park area – GE Provide opportunities for general enterprise and employment Subject to LAP 11.C (Turnapin area)</p> <p>This car park area is outside the Dublin Airport LAP lands.</p> <p>Circulation area- DA - Ensure the efficient and effective operation and development</p>	<p>Neither permitted nor not permitted class but indicated as car park (CP) in development Plan Map 11. Assessed on merits</p>

	<p>of the airport in accordance with an approved Local Area Plan as part of Dublin Airport lands</p> <p>A road proposal is indicated in MAP 11 the line of which traverses the access road on an east west axis and just north of the car park area.</p>	
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5.4. Other Development Plan objectives

- ED31 Dublin Airport supported to maximise its efficiency
- ED32 Balancing economic potential of DA with core operational efficiency
- DA03 Safeguards current and future operations, safety, technical and development requirements of DA
- DA22 states that the supply of car parking to be controlled to maximise the use of public transport and efficient use of land.

5.5. Dublin Airport Local Area Plan

5.5.1. The 2006-2015 LAP has expired and there is no new Local Area Plan to date. In the previous LAP the car parking policy states that: ‘Short-term and long-term passenger car parking facilities will be developed phased in accordance with the airport’s growth and with improved public transport access. Long-term parking will be provided in a number of discrete locations on the periphery of the airport site, with good access from the external road network and frequent shuttle connections to the terminal buildings. Short-term spaces will be provided in multi-storey car park structures in proximity to the terminal buildings. The vast majority of employee parking and car hire parking will be relocated away from the central terminal area. The growth of employee parking will be strictly controlled.’

6.0 CONSULTATIONS – SUMMARY OF KEY ISSUES AND ADVICE

6.1. The minutes of the meetings held with the prospective applicant and consulted statutory bodies are contained with the file and should be read in conjunction with

this report. Key issues arising during the consultation process may be summarised as follows:

- Potential conflict with the Terminal 2 permission in terms of car parking provision having regard to extensive car parking availability in the vicinity of the airport and ultimately conflict with the delivery of a viable public transport service and meeting targets in the Mobility Management Plan for the airport lands.
- Advised the DAA that as this proposal is for permanent use of land and that the strategic impact of this on public transport usage and efficient use of land will be assessed in strategic terms notwithstanding the local objectives. In this regard the Board is mindful of objective DA022.
- Impact over the longer term provision and viability of public transport provision such as the planned Metro was flagged.
- The Board advised that detailed supply and demand analysis of the car parking situation to justify the nature and extent of car parking is needed. The DAA submitted further information in response to issues raised. However, following discussion within the Board, the Board is of the opinion that a more detailed justification is needed for the extent of permanent car parking proposed. In the final meeting with the DAA it was stated that an Environmental Impact Assessment Report is required in view of the strategic infrastructure status of the proposal. It was explained by reference to the original assumptions in the EIS for the terminal 2 application to the prospective applicant that rather than simply accepting the 26,800 cap as the accepted baseline or starting point, the EIAR should review the original EIS and its assumptions to consider if anything of significance has changed in the intervening period that would be relevant to this cap. Critically, the proposed development should be considered in the context of whether the level of car parking is reasonable based on overall parking (including that outside the direct control of the DAA), current and proposed public transport provision, infrastructure, mobility management, traffic capacity and the need for the airport to operate efficiently.
- The NTA was broadly satisfied with the cap insofar as it is an effective measure in controlling car parking supply by the DAA (although not by others). The NTA was broadly satisfied with the rationale for the need for car parking, although it

acknowledged that there may be some merit in revisiting the cap which was originally based on modelling originating from DTO data.

- From the perspective of the local authority there are no conflicts with the on-going road proposals such as in relation to the Harristown commercial zone and the future development of runways and airport improvements.
- The local authority stated that there are currently no capacity issues with the main access road to either car park and the roads are satisfactory although roads within the more immediate vicinity of the airport are fairly much at capacity.
- The local authority has no information on overall car parking in the area. Its measure of control in hotels is by condition of permission excluding airport car parking.
- The NTA referred to a comprehensive transport study for the area which may help an informed decision. The local authority could give no detailed information at time of meeting or shortly after on scope of transport study for the area.
- The NTA is satisfied with the overall compliance with the conditions attached to terminal 2.
- The NTA referred to the need for physical and operational compatibility with public transport provision such as Bus Connect and the Metro.
- The TII supports the NTA in its strategic approach. It supports an airport centred approach and its operational efficiency as a transport mode for passengers from their origin to international destinations. In this regard the capacity of the immediate road network and junction in the vicinity of the airport is its priority.
- The local authority accepts car parking is needed in the area alongside the Metro North project and sees no obvious direct conflict in principle with the development plan.

7.0 Prospective Applicant's Case - Is Strategic Infrastructure

- 7.1. It is submitted that the proposed car park use is strategic infrastructure as it satisfies criteria in S37A in terms of scale and strategic importance to the State and to

achievement of regional or national spatial objectives. This is based on the following considerations:

- Dublin Airport falls with the 7th Schedule class.
- There is precedence set by PC0100 and PC0156 wherein the same car parking was determined to be strategic.
- The National Spatial Strategy is cited in respect of identifying Dublin Airport as the principal airport in the country.
- The Regional Planning Guidelines for the Greater Dublin Area 2010 state that an efficiently functioning, well connected airport is a key competitiveness factor for Dublin, the wider region and the state. (Policy ER7)
- Need to promote and support the role of Dublin Airport as a primary gateway to Ireland and the GDA and as an important employment hub and business location in the region through land-use planning which facilitates the future airport capacity need and by improved transport linkages to the city and region.
- The NTA's GDA Transport Strategy 2016-2035 support the protection and enhancement of access to Dublin Airport as a strategic priority
- Being located wholly within Fingal no other local authorities are directly affected.
- The Development Plan supports the managed supply of car parking as an essential component of Dublin Airport's core operational efficiency

8.0 Strategic Infrastructure – Legal Provisions

8.1. The Board is asked to decide if the proposal is or is not Strategic Infrastructure Development as defined by Section 37A of the Planning and Development Planning Act 2000 as amended by Section 5 of the Planning and Development (Strategic Infrastructure) Act 2006 and by Section 78 of the Planning and Development (Amendment) Act 2010. Strategic Infrastructure is defined in the Seventh Schedule of the 2006 Act and outlines "Transport Infrastructure" as follows:

"An airport (with not less than 2 million instances of passenger use per annum) or any runway, taxiway, pier, car park, terminal or other facility or

installation related to it (whether as regards passenger traffic or cargo traffic).”

- 8.2. Section 37A (1), states that an application for permission for any development specified in the Seventh Schedule shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority. Section 37A (2) (as amended most recently by the Local Government Reform Act 2014), states

That condition is that, following consultation under section 37B, the Board serves on the prospective applicant a notice in writing that, in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely –

- (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,
- (b) the development would contribute substantially to the fulfilment of any of the objectives in the National Spatial Strategy or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,
- (c) the development would have a significant effect on the area of more than one planning authority.

9.0 **Assessment**

- 9.1. The proposed continuance of car parking on a permanent basis for the purpose of providing facilities necessary for the airport operation would constitute strategic infrastructure for the purposes of the Act insofar as it falls within the relevant class of airport development in the Seventh Schedule being ‘Transport Infrastructure’ and insofar as it satisfies the requirements of Section 37(2)(a) and (b) given its economic and social importance and its role in achieving a strategic objective. In addition to the strategic objectives set out in both the National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area and as referred to in Section 7.1, a most salient objective is set out in the more recent National Planning Framework document which centres on the achievement of ‘high quality international connectivity’ and which specifically refers to the enhancement of Dublin Airport and access to delivery of this infrastructure. This framework plan also highlights the importance of the economic and social aspects of the global connection particularly

in light of the altered and emerging international trade, movement and relations pursuant to Brexit.

- 9.2. In a regional context, the NPF seeks to enhance airport access together with improvements in bus, DART and LUAS/Metro networks as part of a Metropolitan Area Strategic Plan for Dublin. It further places Dublin Airport together with both Belfast airports as being significant in the consolidation of the M1 Corridor insofar as they carry 35 million passengers per annum and accordingly can shape and influence a significant corridor catchment.
- 9.3. The prospective applicant makes a coherent case, as has been similarly argued and determined previously, that car parking is an integral element of a multi-pronged approach to providing access to local, regional and national flight catchment. The level, range and management of this parking may arguably serve to compromise the efficiency of the airport by way of traffic congestion arising from increased car dependency – an issue also highlighted in the NPF, however the merits of this are for individual appraisal at application stage. In this regard the attention of the applicant has been drawn to the need to address the underlying issues so as to demonstrate adherence to sustainable land use and transport objectives at a more strategic level. During consultations, particular attention has been drawn to the prospective applicant to the need to review the change in conditions that have shaped the supply and demand for car parking and modal split and the consequent changes in circumstances between the original studies and assessment for the EIS from which the cap was based and the EIAR for the prospective development.
- 9.4. To further put in context of scale, the proposal relates to a large volume of car parking in the order of 12,000 spaces which amounts to a significant portion of total permissible 26,800 long term spaces as stipulated in the governing grant of permission for the Terminal 2 facility. As in previous cases before, which were determined as constituting strategic infrastructure, such as PC0100, this is of an even greater scale.
- 9.5. I concur with the prospective applicant that another local authority will not be directly affected to the extent that it would determine whether or not the proposal is strategic infrastructure. However, I would include Dublin City as prescribed body to be notified in line with Article 213.

10.0 Recommendation

- 10.1. I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 37(B)(4) of the Planning and Development Act 2000, as amended, stating that the proposed development constitutes strategic infrastructure on the following basis.
- 10.2. It is considered that the continuance of the use of long term parking on the scale and extent proposed and on a permanent basis for the purpose of airport parking falls within the 7th Schedule as it is development for the purposes of and relates to an airport (with not less than 2 million instances of passenger use per annum). Having regard to the nature, scale and location of the proposed development, such development meets the criteria set out in section 37A (2) (a) and (b) of the Act for strategic infrastructure development, therefore, a planning application for such development should be made in the first instance to An Bord Pleanála under S37E of the Act.

Suzanne Kehely

Senior Planning Inspector

5th April 2018

Appendix I

Recommended Proscribed Bodies to be notified.

Prescribed bodies under Article 213 (1), for the purposes of section 37E(3)(c), as follows:

- The Minister for Housing, Planning, Community and Local Government.
- The Minister for Communications, Climate Action and the Environment.
- Department of Transport Tourism and Sport
- Environmental Protection Agency
- Irish Aviation Authority
- Fingal Co Council
- Dublin City Council
- National Transport Authority.
- Transport Infrastructure Ireland
- Dublin Regional Authority.
- Failte Ireland
- Heritage Council
- The Health and Safety Authority
- An Taisce - the National Trust for Ireland.
- Inland Fisheries Ireland.

Appendix II

Note on Modelling for Terminal 2 Planning Application – prepared by the NTA during consultation stage as part of the pre-application process.

Modelling

From the records the modelling project for Terminal 2 seems to have started in early 2006 and was finished by the summer of 2006. The task involved the creation of a local area model covering the area from the Malahide road to the N2 and from the M50 to Swords. The LAM was extracted from a 2006 forecast of the of the DTO GDA 2001 base model and it was calibrated to 2006 counts to give a more up-to-date reflection of the traffic conditions. It seems that forecasts were prepared for 2012 and 2020. The forecasts were run through the DTO TAGM and then the GDA model to produce estimates of future flows. These were applied to the 2006 LAM so as to capture the growth, Mode shares and calibration impacts. As the actual files no longer exist it is not possible to state what assumptions were used in the project. The land use forecasts used in the model and the infrastructure proposals (other than they were based on the Strategy “A Platform for Change”) are unclear at this stage.

Appeal Information

Planning Conditions relating to Transport Demand Management and Parking Provision

The provision and management of parking for airport staff and customers is set out in three interrelated planning conditions:

- Condition 12, dealing with all aspects of Airport Mobility Management, including the provision, management and monitoring of parking;
- Condition 23, which specifies that the provision of parking to serve the development shall be the subject of separate planning applications, as required. It also states that any additional parking provided shall have regard to mode share targets established by the MMP and the growth of passenger numbers. Restrictions, or caps are then specified for all categories of parking, having regard to the assumptions made in the EIS, the MMP and the capacity of Phase 1 of the T2 development;
- Condition 24, which requires that charges for public car parking serving the development shall be agreed, having regard to the mode share targets established in the MMP, the availability of parking and the ongoing implementation of public transport services & infrastructure.

The three planning conditions are presented in Appendix 1 to this note.

Parking Policy Context: Dublin Airport Local Area Plan, 2006 – Parking Policies

At the time of the T2 appeal, the policy context for parking provision and parking management at Dublin Airport is set out in the Dublin Airport Local Area Plan:

CP2: removal of staff car parking from the centre of the campus.

CP3: phasing of short-term and long-term passenger car parking having regard to the improvement of public transport access.

CP8: To provide for short-term car parks close to the terminal buildings.

CP9: To control the supply of car parking at the airport so as to maximise as far as is practicable, the use of public transport by passengers and to secure the efficient use of land.

CP10: To limit the growth of employee parking in order to improve public transport usage.

Mobility Management Plan

The MMP submitted by the applicant, set out the following assumptions, on which the parking conditions were based:

MMP Passenger Mode Share

Transport Mode	Mode Share			
	2005	2011	2012*	2020
Car – private	43.8%	42.5%	40.9%	38.2%
Car – rental	5.2%	6%	6%	7%
Bus	24.0%	24.1%	18%	19.7%
Metro	-	-	12.5%	20.3%
Taxi	26%	27%	22.2%	14.4%
Bicycle, motorbike etc	1%	0.4%	0.4%	0.4%
Total	100%	100%	100%	100%
Public Transport & taxi	50%	51.1%	52.7%	54.4%
Public transport	24%	24.1%	30.5%	40%

**Assumes introduction of Metro in 2012*

MMP Employee Mode Share

Transport Mode	Mode Share	
	Current	2020
Car – private	80.2%	71.4%
Bus	16.5%	-
Metro & Bus	-	25%
Taxi	1.5%	1.5%
Bicycle, motorbike etc	2.1%	2.1%
Total	100%	100%
Public transport	16.5%	25%

Rationale for Planning Conditions relating to Parking

The rationale for the planning conditions relating to parking provision and parking management are set out in a report, prepared for ABP on the *Transportation Aspects of the Planning Appeal for Second Terminal and Associated Works at Dublin Airport*. Extracts from this report are presented in **Appendix 2** to this note¹, with the key points presented, below:

Mode Share (assumptions)

- Mode share is inevitably linked with the provision, availability and pricing of car parking, in addition to the measures taken to enhance public transport modes.
- The mode share assumptions in the EIS are detailed in Table 6.12. It indicates that for the 2001 survey, 24-25% of passengers and 17% of employees accessed the Airport by public transport (i.e. bus). It is then assumed that between 25-33% of passengers and 17-19% of employees would access the complex by public transport in the 2012 Do Something scenario.
- With the introduction of Metro and other significant city-wide enhancements in public transport, these figures would rise to 42-46% for passengers and 38-43% for employees.
- These modal choice forecasts extracted from the DTO model are in effect based upon model input specifications by the applicant. Prior to 2012 all public transport access will have to be by bus, as Metro will not be in place until after that date.

(Parking Principles)

- In principle, setting an upper limit on the total amount of parking which will be a direct requirement of the development is considered appropriate;
- applications would still have to be determined on their merits having regard to mode split targets and the provision of public transport;
- Having a mechanism, whereby parking charges on all public car parking serving the subject development can be adjusted to ensure a shift to public transport, could assist in protecting the very significant investment in public infrastructure, particularly Metro.
- Pricing of public long and short term car parking serving this development should be specified as part of any permission issued. The charges should be reviewed on a regular basis, particularly after the introduction of a major piece of public transport infrastructure serving the area.

Passenger Parking (Long Term)

- The EIS states that in 2006 there were 17,500 long term parking spaces;
- Table 6.1 of the MMP indicated that the demand was 19,922 in 2006,
- Section 2.4.4 of the LAP indicates that the shortfall between supply and demand was addressed by interim measures using existing parking areas;

¹ References in the report's extracts to planning conditions and the MMP relate to the original Planning Decision and the MMP prepared by the applicant, at the time of Planning Appeal.

- (Where) the parking charges are known to potential passengers and have an important influence on mode choice before the commencement of the journey;
- Table 6.1 (of the MMP) indicates that 26,808 long term parking spaces would be required by 2016 for 30.2 mppa (Airport capacity after Phase 1 of T2) and 29,269 spaces in 2020 serving 34.2 mppa (Airport capacity after Phase 2 of T2). It is considered that a condition should specify the maximum number of long term spaces is 26,800 to accommodate the ultimate requirements of Phase 1. However each addition to car parking up to that point would still have to be justified in the context of mode share targets and the provision of public transport.

Passenger Parking (Short Term)

- The EIS indicates that the existing (in 2006) short term provision is 2,970 spaces. It is indicated that a 1,500 space multi-storey car park would be provided immediately adjacent to T2, although this would be the subject of a separate planning application. The planning authority has allowed for 1,750 spaces in condition no.12. According to Table 6.1 of the MMP, the existing 2006 demand is 3,018 spaces, which would reach 4,060 spaces in 2016 at 30.2 mppa and 4,433 in 2020 at 34.2 mppa. It is therefore evident that the proposed 1,500 space multi-storey would accommodate both Phase 1 and Phase 2 of the development. Given that it is recommended that permission be refused for Phase 2, the maximum number of short term additional spaces should be 1,000;
- The pricing regime will be important in addressing any problems arising as a result of demand exceeding supply.

Employee Parking

- The EIS indicates that 5,360 spaces are provided for employees. The MMP indicates that the target is 5,540 spaces at 30 mppa. This in effect indicates that there would be no increase in parking for employees. This reflects the requirements of policy CP10 of the LAP which seeks to limit employee parking. The EIS estimates that the number of employees would increase from 12,500 in 2006 to 14,300 in 2012 and 15,500 in 2024. This assumption for 2024 is reflected in the MMP. It is therefore considered appropriate to cap the employee parking at the current levels. This will make it imperative to provide an employee public transport service in the short term.

Maximum Parking Provision

- In general, it is considered that if the maximum quantum of parking indicated in the MMP is exceeded this would undermine the very assumptions upon which the transport impact assessment in the EIS is based. It is therefore considered appropriate to place caps on the amount of long term, short term and employee parking. In the event that significant additional parking is considered necessary over and above these figures, then a revised EIS and associated transport impact assessment would have to be considered as part of a new application.

Traffic and Transport

12. The Mobility Management Plan (MMP) submitted as part of the planning application shall be complied with in full and all costs shall be borne by the developer. In addition, the following associated measures shall be undertaken:
- (a) Specific mode share targets shall be set and made publicly available on a website or similar public forum.
 - (b) Baseline surveys shall be undertaken, as soon as practicable, to establish the following:
 - (i) travel habit surveys, and
 - (ii) parking surveys, including accumulation and duration surveys,
 - (iii) traffic counts of motorised and non-motorised modes to indicate mode share,
 - (iv) queue length, and
 - (v) kerbside surveys.
- This information shall be updated on a regular basis.
- (c) A suitably qualified Mobility Manager shall be appointed upon commencement of development.
 - (d) Annual monitoring reports shall be prepared and made publicly available on a website or similar public forum.
 - (e) The Mobility Management Plan shall be reviewed every two years and the reviewed plan shall be made publicly available on a website or similar public forum.

Reason: In the interest of proper planning and sustainable development, to secure sustainable travel patterns and to accord with the requirements of the Local Area Plan.

23. Provision of parking to serve the development hereby permitted shall be the subject of separate planning applications, as required. Any additional parking provided shall have regard to the mode share targets established by the Mobility Management Plan and the growth of passenger numbers using the Airport. Having regard to the assumptions underpinning the Environmental Impact Statement submitted with the subject application, the submitted Mobility Management Plan and the capacity of Phase 1 of the development, the following restrictions to car parking, which are a direct result of the proposed development, shall apply:

- (a) The total number of long-term public car parking spaces serving the Airport shall not exceed 26,800.
- (b) The total number of short-term public car parking spaces shall not exceed 4,000.
- (c) There shall be no material increase in the number of employee car parking spaces at the airport.

Reason: In the interest of the free-flow of traffic and the proper planning and sustainable development of the area.

24. The charges for all public car parking serving the development shall, following consultation with the Dublin Transportation Office (or its successor), be agreed by the planning authority prior to the occupation of this element of the proposed development. The charges shall be set having regard to the mode share targets established in the Mobility Management Plan, the availability of parking and the ongoing implementation of public transport services and infrastructure. The charges shall be displayed on a website, or similar public forum, and shall be reviewed every two years. In default of agreement, the matter shall be referred to the Board for determination.

Reason: To control the use of parking, reduce car dependency, ensure an appropriate public transport mode share and avoid traffic congestion on the surrounding road network.

APPENDIX 2 of APPENDIX II

Report on Transportation Aspects of the Planning Appeal for Second Terminal and Associated Works at Dublin Airport (Jerry Barnes)

Mode Share

Mode share is inevitably linked with the provision, availability and pricing of car parking, in addition to the measures taken to enhance public transport modes. The mode share assumptions in the EIS are detailed in Table 6.12. It indicates that for the 2001 survey, 24-25% of passengers and 17% of employees accessed the Airport by public transport (i.e. bus). It is then assumed that between 25-33% of passengers and 17-19% of employees would access the complex by public transport in the 2012 Do Something scenario. With the introduction of Metro and other significant city-wide enhancements in public transport, these figures would rise to 42-46% for passengers and 38-43% for employees. These modal choice forecasts extracted from the DTO model are in effect based upon model input specifications by the applicant. Prior to 2012 all public transport access will have to be by bus, as Metro will not be place until after that date.

Parking

Car parking targets are established in the MMP. The question arises as to whether these targets should represent a cap on car parking provision and if such a cap should be specified in a planning condition. The LAP does not impose a cap, but **in principle, setting an upper limit on the total amount of parking which will be a direct requirement of the development is considered appropriate.** It will remove some uncertainty in the consideration of future applications for long and short stay car parking by avoiding incremental increases above the cap. However, such a cap will not assist in the determination of individual applications for car parking up to the cap, which would be provided in line with air traffic growth in accordance with policy CP3. **These applications would still have to be determined on their merits having regard to mode split targets and the provision of public transport.**

There are no provisions in the MMP relating to the structure of public car parking charges, which can have a critical role to play in determining mode share. **Having a mechanism, whereby parking charges on all public car parking serving the subject development can be adjusted to ensure a shift to public transport, could assist in protecting the very significant investment in public infrastructure, particularly Metro.** It is also noted that condition no.11 allows for the availability and cost of parking to be used as a mechanism to alter mode share. However, it is not considered that the wording of this condition is clear or robust enough to stand up to the five tests for conditions outlined in the Development Management Guidelines. **Pricing of public long and short term car parking serving this development should therefore be specified as part of any permission issued. The charges should be reviewed on a regular basis, particularly after the introduction of a major piece of public transport infrastructure serving the area.**

Passenger Parking

There is no car parking proposed in this application, although it will be an inevitable requirement. There are no specific parking standards in the LAP. There is significant potential for the ad hoc, incremental and demand led provision of public car parking, which can lead to unsustainable trip generation patterns. Submission BV, 3rd May, detailing the planning history, illustrates the confused current state of permitted provision. Many of the permissions are temporary.

Long Term

The EIS states that in 2006 there were 17,500 long term parking spaces, 3,500 of which were operated privately by the Quick Park car park off the R132. Table 6.1 of the MMP indicated that the demand was 19,922 in 2006. Section 2.4.4 of the LAP indicates that the shortfall between supply and demand was addressed by interim measures using existing parking areas.

Peak demand for long term parking only occurs during the summer period. As Mr. Sean McGrath (planning authority) highlighted, restricting the availability of parking for passengers will not have an impact upon mode split, because when the mode of transport is chosen at the start of the journey customers will always assume that there will be parking available. To arrive at the Airport only to find the car parks full would lead to a very frustrating experience for the travelling public. However, **the parking charges are known to potential passengers and have an important influence on mode choice before the commencement of the journey.**

Table 6.1 (of the MMP) indicates that 26,808 long term parking spaces would be required by 2016 for 30.2 mppa (Airport capacity after Phase 1 of T2) and 29,269 spaces in 2020 serving 34.2 mppa (Airport capacity after Phase 2 of T2). **It is considered that a condition should specify the maximum number of long term spaces is 26,800 to accommodate the ultimate requirements of Phase 1. However each addition to car parking up to that point would still have to be justified in the context of mode share targets and the provision of public transport.**

Short Term

The EIS indicates that the existing (in 2006) short term provision is 2,970 spaces. It is indicated that a 1,500 space multi-storey car park would be provided immediately adjacent to T2, although this would be the subject of a separate planning application. The planning authority has allowed for 1,750 spaces in condition no.12. According to Table 6.1 of the MMP, the existing 2006 demand is 3,018 spaces, which would reach 4,060 spaces in 2016 at 30.2 mppa and 4,433 in 2020 at 34.2 mppa. **It is therefore evident that the proposed 1,500 space multi-storey would accommodate both Phase 1 and Phase 2 of the development. Given that it is recommended that permission be refused for Phase 2, the maximum number of short term additional spaces should be 1,000.**

The pricing regime will be important in addressing any problems arising as a result of demand exceeding supply.

Employee Parking

The EIS indicates that 5,360 spaces are provided for employees. The MMP indicates that the target is 5,540 spaces at 30 mppa. This in effect indicates that there would be no increase in parking for employees. This reflects the requirements of policy CP10 of the LAP which seeks to limit employee parking. The EIS estimates that the number of employees would increase from 12,500 in 2006 to 14,300 in 2012 and 15,500 in 2024. This assumption for 2024 is reflected in the MMP. **It is therefore considered appropriate to cap the employee parking at the current levels. This will make it imperative to provide an employee public transport service in the short term.** The employee parking would ultimately be removed from the central campus in line with policy CP2.

Car Hire and Other Parking

The MMP estimates that there are 1,500 car hire, VIP, hotel and other spaces in the campus. It envisages that 500 spaces will be maintained in the terminal areas with further car hire spaces and facilities provided in Eastlands. It is not considered necessary to restrict parking for car hire or hotel uses, as this is unlikely to have an impact upon mode share and such a restriction could adversely affect tourism.

Maximum Parking Provision

In general, it is considered that if the maximum quantum of parking indicated in the MMP is exceeded this would undermine the very assumptions upon which the transport impact assessment in the EIS is based. **It is therefore considered appropriate to place caps on the amount of long term, short term and employee parking. In the event that significant additional parking is considered necessary over and above these figures, then a revised EIS and associated transport impact assessment would have to be considered as part of a new application.**