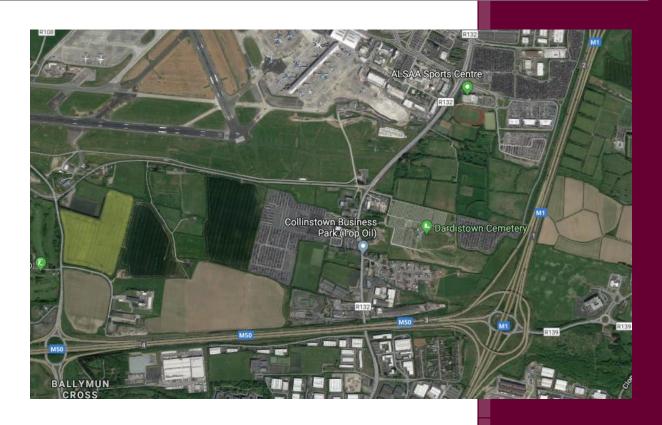
September 2018

Planning Statement



Lands at Quickpark Car Park, Turnapin Great, Swords Road (Old Airport Road), Santry, Co. Dublin



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1.0 Introduction

Downey Planning, Chartered Town Planners, No. 1 Westland Square, Pearse Street, Dublin 2, In accordance with Section 37E of the Planning and Development Act 2000 (as amended), have been engaged by Mr. Gerard Gannon to prepare this planning statement for a Strategic Infrastructure Development application to An Bord Pleanála in relation to the following proposed development on lands at Quickpark Car Park, Turnapin Great, Swords Road (Old Airport Road), Santry, Co. Dublin:

"Planning permission for the permanent continuation of use of the existing long term car park known as Quickpark on lands at Quickpark Car Park, Turnapin Great, Swords Road (Old Airport Road), Santry, Co. Dublin that is currently used for the same purpose under and in accordance with temporary planning permission ABP Ref. 06F.PA0023. Planning permission is also sought for the construction of a new entrance building with associated revised entrance layout resulting in 6,122 long term car parking spaces (reduced from the permitted 6,240 spaces to accommodate a new entrance building). The proposed development of 6,122 long term car parking spaces is provided for under condition no. 23 of the Terminal 2 planning permission Reg. Ref. PL06F.220670 (F06A/1248). The proposed development includes the demolition of the existing single storey office and control building; demolition of existing canopy entrance structure, the relocation of the existing maintenance shed and the construction of a new part three storey entrance building comprising office space with new car park barriers and ticket machines together with premium car parking offer, elevational signage, green roof, landscaping and associated revisions to the entrance layout to accommodate the new building. Permission is also sought for the continued use of existing ancillary infrastructure and facilities including: existing internal circulation road; hard-standing; lighting; boundary fencing; bus shelters; CCTV cameras; signage; existing drainage network including existing surface water attenuation areas, foul water connection, water supply, associated landscaping and all ancillary works necessary to facilitate the development erected under and in accordance with ABP Ref. 06F.PA0023 and Reg. Ref.s F99A/0376/PL06F.112955, F02A/1110, F05A/1464 and F06A/1746. The development also includes new ancillary infrastructure and facilities/drainage improvement works including additional filter drains at the new building and swales along new entrance layout. Access to the car park is from the previously permitted signal-controlled junction on the Swords Road (Old Airport Road) with turning lanes and directional signs. Planning permission is also sought to retain existing hard standing surface area associated with the premium valet offer of the car park. This application is accompanied by an Environmental Impact Assessment Report and a Natura Impact Statement."

As part of the submitted Strategic Infrastructure Development application, an Environmental Impact Assessment Report (EIAR), and a Natura Impact Statement (NIS) has been prepared as part of the submitted application.

This application is seeking permanent planning permission for the existing Quickpark car park and a new entrance building. The justification for permanent planning permission is set out as follows:

- The Quickpark car park provides necessary and key supporting infrastructure to Dublin Airport
 and has done so for nearly 20 years. Dublin Airport is of strategic long-term economic
 importance and requires safeguarding. The existing Quickpark car park provides additional
 supporting uses to the airport itself.
- Passenger numbers at Dublin Airport have risen year on year, and over the coming years, Dublin Airport is expected to expand its operational capacity with the construction of an additional runway (capacity of 32million passengers). This will create a need for additional long term car parking facilities. The Quick-Park facility currently provides c.6,240 long term car parking spaces to this requirement. Quickpark will provide essential long term car parking spaces to the Airport which ensures the Airport can operate efficiently.
- Quickpark forms part of the 26,800 car parking spaces which has been assessed in the
 Terminal 2 application as being required to serve Dublin Airport. This is acknowledged within
 the DAA's concurrent application for permanent planning permissions for the Holiday Blue
 and Express Red Car parks. The car parks combined are under the 26,800 car parking spaces
 benchmark for long term parking to serve the airport. There are no additional authorised long
 term car park facilities at Dublin Airport.
- The Quickpark car park is fully in accordance with the GE Land Use Zoning and the 'CP' Car Park objective applicable to the land as set out in the Fingal County Development Plan 2017 – 2023 in recognition of its long established-use as part of critical airport surface infrastructure.
- The Quickpark lands are within both the Inner and Outer Public Safety Zone (PSZ) at Dublin Airport. These safety zones place restrictions on the type of development permitted in the vicinity of the airport. Car parking is the most appropriate land use for the optimum use of the lands.
- The Fingal Development Plan supports the use of the lands for a long term car park by means of the local objective and does not include any policies or objectives that would disallow the current car park from operating on a permanent basis.
- Permanent planning permission is appropriate having regard to the established nature of the car park which is fully constructed and in situ and its location proximate to Dublin Airport.
- Whilst the preferred access mode to Dublin Airport is bus as set out in the Airports Mobility
 Management Update 2017, the long term car parks facilitate access for 1 in 3 passengers,
 particularly during early morning periods where public transport is limited or unavailable.
 53.4% of journeys to the airport by car originate from outside the Greater Dublin Area where
 transport options are limited.
- The Quickpark car park which comprises c. 6,240 spaces, in conjunction with the DAA long term car parks (Blue and Red) which comprises 19,180 spaces, does not exceed the Cap of 26,800 car parking spaces serving Dublin Airport as set out under Condition 23 of Ref.

PL06F.220670/F06A/1248. Therefore, the quantum of car parking is in line with previous assessments for the Airport.

- It is more appropriate particularly in terms of protecting the environment noting the potential impacts associated with constructing a new car park on greenfield lands.
- The granting of permanent planning permission will put an end to the costly reoccurrence and administrative burden of repeat applications for a Strategic Infrastructure Development.
- The granting of permanent permission does not preclude the lands from any future applications for alternative developments.
- A permanent planning permission will ensure that an existing and established car parking
 resource is available to the airport to safeguard its efficient operation and will have regard to
 the national importance of the airport noting that public transport to the airport is not feasible
 from all counties.

In light of the above, permanent planning permission is being sought. It is submitted throughout the application that Quickpark is an essential piece of surface access infrastructure serving Dublin Airport, forms part of the long term existing car parking requirement for Dublin Airport as assessed and provided for under condition no. 23 of the Terminal 2 planning permission Reg. Ref. PL06F.220670 (F06A/1248) and is one of three long term car parks serving Dublin Airport permitted under the Strategic Infrastructure process. The requirement for car parking has not changed in the intervening period since the requirement was assessed under the Terminal 2 permission noting that Dublin Airport serves a national catchment and that public transport is not always an available or reliable option particularly at early morning and late night when flight times are frequent.

The justification for the granting of a permanent planning permission is set out within this report and within the accompanying EIAR. A new entrance building to serve the car park is also proposed which results in minor alterations to the existing layout. It is considered that the proposed development is in accordance with national, regional and local planning policy and accordingly planning permission is being sought.

2.0 Site Location

The application site comprises 16.9 hectares and is located 1km south of Dublin Airport on the west side of the R132 Swords Road (Old Airport Road). It has a splayed frontage of c.55m onto the road (narrowing to c.25m) with the car park area set back from the main road by c.150m. The surrounding area along the Swords Road is mainly dominated by warehouse type buildings and car related uses such as car rental businesses, garages and petrol stations. The Carlton Hotel is located to the south of the site entrance and backs onto the car parking area. Some industrial/warehousing type premises are located to the north of the entrance. The car parking area is otherwise surrounded by agricultural land and sports grounds.



Fig 1 – Aerial of existing Quickpark Car Park



Fig 2 – Existing Canopy entrance and ticket barriers



Fig 3 - Existing Office and Control Building

There is a single signal-controlled access to the site from the R132. The only permanent structure is a former bungalow which has been converted to office use for the management of the facility. Other structures include a canopy over the entrance/exit barriers, a maintenance shed and bus shelters along the circulation road. The site is flood lit at night. Site boundaries are defined by palisade fences and hedgerow-lined embankments. There is an existing entrance canopy with automatic barriers that serves as the entrance to Quickpark. Access is via an existing signal-controlled junction from the R132. The site currently comprises internal circulation road, hardstanding, public lighting, ticket machines, boundary fencing, CCTV cameras, bus shelters, signage etc. The site is served by existing infrastructure facilities including connections to mains for water and foul sewer with existing surface water attenuation measures on site.

The car park was originally constructed in two phases with phase 1 (3,500 spaces) having been in operation for approximately 17 years and phase 2 (an additional 2,740 spaces) having been in operation for almost 12 years. The overall car park now has the benefit of an extant planning permission for 6,420 car parking spaces approved under the Strategic Infrastructure Development process for a temporary period of 7 no. years and will expire on 4th October 2018 (or 6th December 2018 including the 63 days for the Christmas period over the seven years) under Reg. Ref. 06F.PA0023.

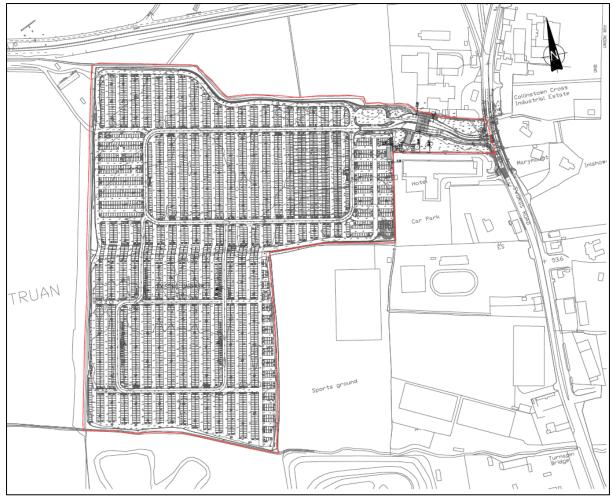


Fig 4 - Existing Car Park Layout at Quickpark

3.0 Proposed Development

Permission is being sought for the permanent continuation of use of the car park and for a new entrance building to serve the car park. The development will result in the removal of approximately 118 no. spaces to facilitate the proposed new entrance building such that Quickpark will comprise 6,122 long term car parking spaces along with a new entrance office building. The new entrance building has been designed by Wilson Architects and provides for a high-quality building which will be utilised as office space by Quickpark whilst also marking the entrance to Quickpark with an aesthetically pleasing development.

It is proposed to demolish the outdated and run-down existing single storey office and control building and to replace same with the proposed part three storey entrance building with new car park barriers and ticket machines together with premium car parking, elevational signage to new entrance building, green roof and associated revisions to the layout to accommodate the new building.

The total area of demolition comprises 470 sq.m. The existing maintenance shed which comprises 100sq.m. is to be relocated to facilitate the new building. The proposed changes relate to 1.721 ha of the overall car park which comprises 16.9 hectares. There are therefore no changes proposed to the majority of the car park. There are no changes proposed to the layout of the existing car park apart

from those set out below to accommodate the new building. The existing site layout plan, existing road network, parking bays, bus shelters, public lighting etc., that is on site will remain. Whilst there may be minor relocations to existing public lighting poles to accommodate the new building, the height, illumination etc., will be as per existing public lighting which has been agreed.

The proposal for a new entrance building arises from a site requirement to both continue the carpark vehicular access and introduce a separate route for the airport terminal shuttle bus service including emergency and larger vehicles if required. The building has been positioned approximately 65 metres further into the site from the existing canopy location.

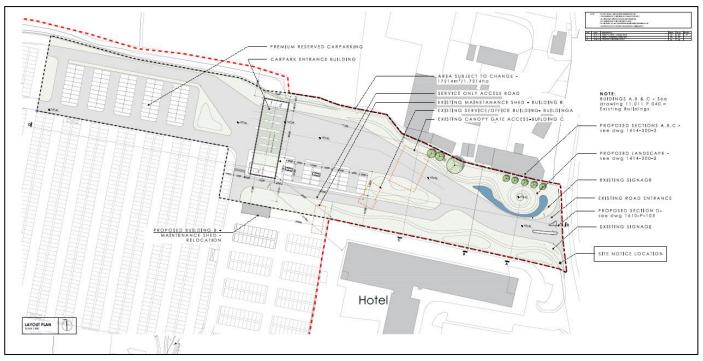


Fig 5 - Proposed Site Layout Plan

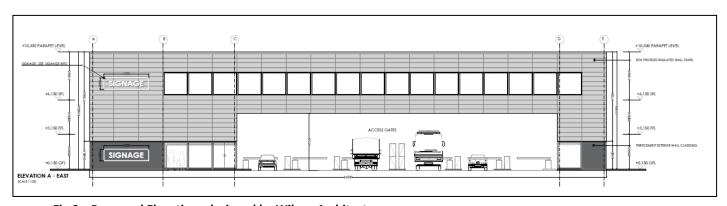


Fig 6 – Proposed Elevations designed by Wilson Architects

The entrance building will provide a quality entrance to the existing carparking facility and proposes the removal of the existing temporary aspects of the current carpark entrance and approach. The resultant design is for a barrier car access through a new 3 storey 'Pavilion' Building to the car park with ancillary staff facilities and offices for Quickpark operations.

The new 3 storey carpark barrier and entrance building is 10.330 metres in height with a building footprint of 46.2 x 5.4 metres with an overall floor area of 1,043m2. The building is envisaged as 'pavilion' in nature due to its freestanding site context and its 'use' relationship to the adjacent and expansive carpark facility.



Fig 7 – Photomontage of the proposed entrance building

The ground floor of the building will support accommodation for a Premium parking facility linked into a premium parking double height reception and seating area for those availing of the premium service, having dropped off their car and are awaiting the bus departure to the airport terminal. Customer service provision to include small self-service beverage and snacks and toilet facilities. At first floor level, there is provision for meeting rooms and staff room facilities linked to the second-floor office level accommodation.

In addition to the ground floor Reception area and Public/Carpark user facilities, it is proposed to use the second floor 'canopy level' of the proposed new entrance building for office use. The current operator of the Long Stay Carpark and the associated transport shuttle bus link to airport requires headquarter office accommodation for both the administration and operation elements of the business. There is also a requirement to expand the Premium Parking offer within the business and the associated additional staff requirements. The staff number provision is calculated at 40 persons. The proposed office area will provide for the following departments within the organisation;

- Administration
- Financial Control
- Human Resources & Staff Management
- IT Department & Online support

In addition to the office floor requirements, the building proposal includes for a number of meeting rooms, staff training rooms and staff facilities.

The personnel on the ground managing and supervising the carpark can number up to 20-30 persons on rotation over the 24hr operational period. They are provided with kitchen/dining facilities including changing/shower rooms at the first floor levels of the building. The design of the proposed building has been carefully considered in light of the surrounding environment and is considered to be a high quality development. In light of pre-planning discussions, a green roof is proposed to the new building and details of signage to the elevations are also enclosed. Please refer to the enclosed drawings and Architectural Design Statement prepared by Wilson Architects for the design of the new building. The materials which are set out within the enclosed Design Statement have been carefully chosen to allow for mobile crane erection and indeed to ensure that there is no glare or reflection. Please refer to the design statement for further details.

There are no changes proposed to the existing layout for the remainder of the car park. Permission is being sought for the continued use of the existing facilities including existing surface roads, bus shelters, public lighting, surface water attenuation etc. Please refer to the enclosed plans prepared by Waterman Moylan Consulting Engineers which sets out the existing and proposed car parking layouts and the existing and proposed engineering details.



Fig 8 – Existing and Proposed Car Park Layout (to the north)



Fig 9 – Existing and Proposed Car Park Layout (to the south)

It is submitted to the Board that the proposed continuation of use of the existing car park and a new ancillary entrance building is in accordance with the proper planning and sustainable development of the area.

4.0 Planning History

Downey Planning have carried out a detailed online assessment of the planning history pertaining to the subject site. There are a number of planning applications pertaining to the subject site and these are outlined below:

• ABP Ref. No. 06F.PA0023 – An Bord Pleanála granted permission for a Strategic Infrastructure Development application dated 6th April 2011, for the continued operation of the Quickpark Long Stay Carpark at Turnapin Great, Swords Road (Old Airport Road), Santry, Co. Dublin. Permission was granted for a temporary period of 7 no. years until 4th October 2018 for: 6,240 no. long term car parking spaces; Ancillary infrastructure and facilities including circulation road, hard standing, maintenance shed, control building, bus shelters, CCTV, landscaping, new ancillary infrastructure and existing entrance;

- Reg. Ref. F06A/1277 On 25th October, the decision WITHDRAW APPLICATION was made by Fingal County Council for the construction of an at-grade Car Park with 2745 spaces together with associated internal roads and bus shelters on lands adjoining an existing approved car park (permitted under planning permission F05A/1464). Access to the proposed Car Park is through the existing approved Car Park which is accessed from an existing signal controlled junction on the Swords Road (Old Airport Road). The proposal includes the removal of 5 spaces in the existing approved Car Park to provide access to the proposed Car Park.
- Reg, Ref. F06A/1746— On 30th July 2007, Fingal County Council granted permission for the construction of an at-grade car park with associated internal roads and bus shelters on lands adjoining an existing approved car park (permitted under planning permission F05A/1464). Access to the proposed car park is through the existing approved car park which is accessed from an existing signal controlled junction on the Swords Road (Old Airport Road). The proposal includes the removal of 5 spaces in the existing car park to provide access to the proposed car park. An appeal was lodged on 27th August 2007 but was subsequently withdrawn on 24th September 2007 under ABP Ref. PL06F.225225.
- Reg. Ref. F05A/1464 Permission for continuation of use of an at grade Car Park with 3500 Car Parking spaces together with associated entry/exit control facilities, bus shelters, hard-standing for service vehicles, biocycle waste water treatment control building with staff facilities, site access to Swords Road (Old Airport Road) via signalled control junction with turning lanes and directional signs permitted under planning permission (F02A/1110). Granted by Fingal County Council on 28th February 2006.
- Reg. Ref. F03A/1224 Permission for the construction of a temporary surface car park. Fingal County Council refused permission on 11 November 2003. An appeal was lodges on 4th December 2003 and a decision was issued noting withdrawn application by An Bord Pleanála on 14th January 2004 (ABP Ref.PL06F.205286).
- Reg. Ref. F02A/1110 —Permission for At-Grade car park with 3,500 car parking spaces, together with associated entry/exit control facilities, bus shelters, hardstanding for service vehicles, biocycle waste water treatment, demolition of one existing habitable dwelling and change of use of second habitable dwelling to use as a control building and for staff facilities. Access to the carpark is from the Swords Road (Old Airport Road) and includes a new signal controlled junction with turning lanes and new directional signs at Swords Road, Santry, Dublin 9. Fingal County Council granted permission on 18th October 2002.
- Reg. Ref. F99A/0376 On 16th August 1999, planning permission was granted by Fingal County Council for an at grade car park with 3,500 car parking spaces together with associated entry/exit control facilities, bus shelters, hardstanding for service vehicles, biocycle waste water treatment, demolition of one existing habitable dwelling and change of use of second habitable dwelling to use as a control building and for staff facilities. Access to the Car Park is from the Swords Road (Old Airport Road) and includes a new signal controlled junction with turning lanes and new directional signs on lands at Turnapin Great, Swords Road (Old Airport

Road), Santry, Co. Dublin. An appeal was lodged on 13th September 1999 and the decision to grant permission was upheld by An Bord Pleanála on 9th March 2000 (ABP Ref.PL06F.112955).

Downey Planning understand that this represents the full extent of the planning history pertaining to the subject site and is evident that the subject site has an established planning precedent where it identifies the application site as being suitable for a car park development.

5.0 Pre-Planning Consultation

Downey Planning and the design team on behalf of the applicant engaged in pre-planning consultations with An Bord Pleanála on 5th April 2018 and 4th July 2018. Pre-planning consultations were also undertaken with the Planning Department, Transportation Department and the Water Services Department of Fingal County Council as well as consultations with the Irish Aviation Authority and the Dublin Airport Authority. There was no objection in principle to a permanent planning permission for Quickpark noting its established use, location proximate to the airport and the existing infrastructure in place which serves the existing car park. The key points of the consultations are as follows:

Fingal County Council - Planning Department

Anne McElligott of Downey Planning engaged with the Planning Department (Paul O'Brien) on 17th April 2018 via telephone correspondence – Ref. 24602 applies. This telephone conversation followed a previous meeting in December 2017. The following was discussed –

- There has been no major change to the drawings that were previously tabled in December except for minor updates to the new building elevations and floor plans.
- The existing entrance building will be demolished and the proposed new entrance building will be set back further into the site.
- Downey Planning confirmed that there will be no further changes to the car park other than the layout at the entrance to accommodate the new entrance building.
- Fingal County Council confirmed that the design of the entrance building is acceptable (the
 design of which Downey Planning confirmed will be in accordance with IAA requirements for
 glare/reflection etc).
- Compliance with ERM Public Safety report will be required along with justification for the office space proposed who will be utilising the office space and where the users of this office space are currently located to be set out clearly within the application.
- Details of signage to be included in application.
- Fingal County Council confirmed that the principle of continued use of the Car Park is acceptable **no issue with principle if permanent permission is sought**.
- It was confirmed that Downey Planning are engaging with the IAA and the DAA and that another meeting with ABP will be required.
- A further meeting at this stage is not required but can be held if required following further consultations with the IAA and DAA.

Fingal County Council - Water Services Department

Waterman Moylan Consulting Engineers engaged with the Water Services Department on 23rd May 2018 in Fingal's Swords Offices and subsequently engaged with the Water Services Department via email. The following was discussed –

- The proposed new control building with public and staff welfare facilities will have filter drains installed around the perimeter which will accommodate downpipes as requested by FCC.
- The filter drains will discharge into a swale running along the length of the revised access.
 Openings in the kerb every 10m along the length of northern access route, will result in direct drainage from the new blacktop surface to the swale. The existing gullies and drains along the northern side of the access route will in turn be decommissioned. The swale shall discharge into the existing surface water drainage network upstream of the existing hydrobrake manhole.
- The southern section of the revised carpark entrance will be drained by a filter drain, originating from the proposed relocated control building and running the full length of the southern side of the revised access route. The existing gullies along the southern kerb line shall be relocated to match the proposed southern kerb line and drain directly to a new filter drain located south of the footpath.
- The proposed filter drain running the southern length of the proposed revised access route shall discharge into the existing surface water drainage network on the southern side of the revised car park access, upstream of the existing hydrobrake manhole.
- FCC confirmed via email on 27th June 2018 that they have no objections to the SuDS measures
 proposed and no objections to the existing culvert running east-west across the site
 remaining.

Fingal County Council Transportation Department

Waterman Moylan Consulting Engineers engaged with the Transportation Department on 22nd May 2018 via email. The following was discussed –

- The issues were dealt with in the original application and similar considerations apply to the DAA's car parks nearby.
- Any issue(s) can be dealt with by email a meeting may not be necessary.
- Clarification was sought on new entrance proposals.
- Moylans confirmed that proposal is for the continuation of use of the existing long stay car
 park along with a new associated exit / entry control facilities and approach layout to the exit
 / entry facility. It is also proposed to provide a new facility building at this location. In order
 to facilitate the upgrade works at the existing entrance, the total car parking spaces shall be
 reduced from 6,240 to 6,122 spaces.
- FCC indicated that at a later stage, it would be useful as background information to know what the traffic flows are, the diurnal and seasonal profiles, and the number booking in advance.
- The Transportation Planning Section has no objection in principle to the proposed development.

Dublin Airport Authority (DAA)

Downey Planning engaged with the Dublin Airport Authority on 24th May 2018 via telephone correspondence. The following was discussed –

- The DAA have lodged their application to the Board under the SID process.
- The DAA have no objection to Quickpark applying for permanent planning permission for a long term car park.
- The DAA SID application includes the Quickpark Car Park as part of the long term parking quantum's for Dublin Airport.

Irish Aviation Authority (IAA)

Downey Planning engaged with the Irish Aviation Authority on 28th May 2018 via telephone correspondence. The following was discussed –

- The IAA have indicated that they have no issues with the proposed Quickpark car park
- The proposed building appears to be outside of the approach surface 1634. Clarification on the ground level of the building is required but would appear to have no issue with same.
- Clarification on the method of construction as part of the application i.e. mobile crane and 30 days notification of commencement of construction of building.
- Confirmation of materials as part of the application indicating no glare.
- Public lighting to face downwards. Downey Planning confirmed this will be as per the existing public lighting on site.
- The IAA have no objection to Quickpark applying for planning permission for a long term car park.

An Bord Pleanála

The applicant also engaged in pre-planning consultations with An Bord Pleanála on 5th April 2018 and 4th July 2018. The key points discussed at the meeting include:

- The general consensus was that the application was likely to be deemed Strategic Infrastructure Development noting the planning history pertaining to the site where the previous temporary permission was deemed to be SID. It was stated that the Board will make the decision on whether the proposal constitutes a strategic infrastructure development.
- It was noted that the planning permission was temporary and set to expire on 4th October 2018 and the design team requested that the tight timeframe be kept in mind during the assessment of the pre-planning consultations.
- A general discussion on issues regarding airport car parking, the number of car parking spaces
 proposed, the cap on car parking as set out in conditions attached to Terminal 2 permission
 and what existing car parks are in the wider area serving Dublin Airport (including Hotel
 offering car parking) that are operating was discussed. It was confirmed that there are no

other long term car parks approved to serve Dublin Airport other than Quickpark and the two DAA long term car parks.

- The use of the proposed entrance building was discussed. The Board noted that the use of the
 office space was to be clearly detailed as part of the planning application. It was confirmed
 that the office space was for use by Quickpark car park on site staff including bus drivers (i.e
 ancillary to the car park), as well as Quickpark car parks administrative staff (eg. Accounts,
 administration, marketing etc).
- It was agreed that a green roof would be incorporated into the design of the entrance building.
- The Board noted that the applicant was to engage with the Water Services Department regarding the closure of the riparian strip. Waterman Moylans subsequently engaged with Water Services who confirmed that they are happy with this and the additional SuDS measures proposed by the applicant.
- Temporary vs. permanent planning permission was discussed. It was noted that the car park
 has been operating for nearly 20 years and is in essence a permanent car park. Confirmation
 that permanent planning permission was being sought was confirmed at the second preplanning meeting with the Board.
- It was discussed at the second pre-planning meeting that a strong case would have to be made to justify the volume of car parking by reference to compliance to the cap in the Terminal 2 permission whilst having regard to further developments at the airport, whether the level of car parking proposed is reasonable based on parking including that outside of the control of the DAA and Quickpark, current and future public transport provisions, infrastructure, mobility management, traffic capacity and the need for the airport to operate efficiently.

The issues that arose throughout the consultations are addressed within the planning application.

6.0 Car Parking at Dublin Airport

This section of the Planning Statement will outline the status of car parking in the vicinity of Dublin Airport.

6.1 Terminal 2 and Car Parking Condition:

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 states that the total number of long-term public car parking spaces serving the Airport shall not exceed 26,800 and the total number of short-term public car parking spaces shall not exceed 4,000. 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.

Under Condition 23 of the Terminal 2 permission Reg. Ref. F06A/1248 and An Bord Pleanála Ref. PL06F.220670, it was confirmed that the long term car parking requirements for Dublin Airport is 26,800 car parking spaces which is necessary and appropriate for the operation of Dublin Airport.

6.2 Current Long-Term Car Parking Spaces

It is important to note that there are only three authorised long-term car parks approved for Dublin Airport which provide for a total of 25,420 car parking spaces which is below the limit applied under Condition 23 attached to the Terminal 2 permission.

Quickpark provides for 6,240 long term car parking serving Dublin Airport. It is one of three car parks providing long term car parking to Dublin Airport with the other two designated long-term car parks comprising the Holiday Blue (8,840 car parking spaces) and Red Express (10,340 car parking spaces) car parks, both of which are operated by the Dublin Airport Authority (DAA). Table 1 below illustrates the total long term car parking spaces available to Dublin Airport.

The total overall long term parking for Dublin Airport is 25,420 parking spaces which have been approved under the Strategic Infrastructure Development procedure. Car parking for Dublin Airport should be approved under the SID procedure in accordance with the Planning and Development Act 2000 (as amended) which states under Section 37A that an application for any development specified in the Seventh Schedule shall be made to the Board under Section 37E and not to a planning authority. The Seventh Schedule sets out the Infrastructure Developments for the purposes of Sections 37A and 37B of the Act and states the following in relation to Transport Infrastructure:

"Development comprising or for the purposes of any of the following:

—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)."

Therefore, <u>the only authorised car parks</u> serving Dublin Airport and providing long term car parking are <u>Quickpark and the DAA Holiday Red and Express Blue Car Parks</u> all of which have been previously approved under the Strategic Infrastructure Development procedure. The overall car parking provided

within these three car parks is 25,425 car parking spaces which is below the 26,800 spaces cap under the Terminal 2 permission and therefore the proposed car park is below the maximum threshold for car parking for Dublin Airport.

Authorised Long Term Car Parking Spaces				
Quickpark	6,240			
Holiday Blue	8,840			
Red Express	10,340			
Total Long-Term Parking Spaces	25,420			
Permitted Car Parking Spaces – Terminal 2 Application	26,800			
Condition No. 23 – Ref. PL06F.220670 (F06A/1248)				

Table 1- Long Term Car Parking Spaces

It is submitted that the long-term car parking spaces approved for Dublin Airport which provide for a total of 25,420 car parking spaces is below the limit applied under Condition 23 attached to the Terminal 2 permission.

The demand for long term car parking serving the Airport has not reduced in the period since the last temporary permission for Quickpark. In fact, it is considered that this demand has increased noting the significant increase in passenger numbers over the last number of years with 29.6 million passengers using Dublin Airport in 2017. Passenger numbers are now at a comparable level to that predicted when the Terminal 2 permission (32 million passengers per year) was granted and thus it has already been established in the Terminal 2 assessment that this level of patronage requires 26,800 long-term car parking spaces in order to ensure the efficient function and operation of the Airport and to ensure the successful operation of the Irish Economy.

It is important to note that there are no additional authorised long term car parks approved for Dublin Airport. Parking in the vicinity of Dublin Airport to serve the airport has been prohibited by Fingal County Council and An Bord Pleanála through conditions. Downey Planning have conducted a search of permissions in the vicinity of the airport which is set out in Section 6.3 below.

6.3 Airport Car Parking Prohibited As Part Of Development Proposals

Parking in the vicinity of Dublin Airport to serve the airport has been prohibited by Fingal County Council and the Board through conditions attached to permissions exclusively stating that parking is to be provided for the use of the permissions and not for Dublin Airport car parking. Downey Planning have conducted a search of permissions in the vicinity of the airport which is set out in the table below which clearly indicates that the permissions do not authorise long term car parking for Dublin Airport and car parking within developments in the vicinity of the airport is for ancillary use to the developments. This coincides with the fact that any car park serving Dublin Airport has to be approved under the StrategiC Infrastructure procedure and only 3 such car parks have been approved for same (Holiday Red, Express Blue and Quickpark).

Reg. Ref.	Location	Proposed Car Parking Spaces	Fingal/ABP Decision	Car Park Status
F14A/0465 (ABP Ref. PL06F. 245362)	Bewleys Hotel Dublin Airport	367	Grant Permission (A total of 367 is to be provided. Condition No. 3	Condition No. 4 - Car parking is solely for hotel related uses and shall not be used as 'Park and Fly' parking (that is parking which is not directly ancillary to the use of accommodation in the hotel by the drivers/occupants of such cars).
F16A/0587	Hotel Adjacent Carlton Hotel, Dublin Airport	33	Grant Permission	Condition No. 11 - The proposed Car parking shown within the area outlined in red and all existing car parking shall only be used for hotel related uses and not for long term airport related use 'including park and fly facilities'.
F17A/0255	Holiday Inn Express Hotel Dublin Airport, Santry	120	Grant Permission	Condition No. 4 (FCC) – All car parking spaces shall only be used for hotel relates parking and shall not be used for airport related parking.
F17A/0308	Horizon Logistic Park, St. Margarets	121	Grant Permission (A maximum of 121 spaces is to be provided. Applicant is to submit revised parking plans as per Condition No. 4)	Condition No. 2 (FCC) – Car parking is to be ancillary to office use and shall not be sold or leased separately of the relevant unit.
F17A/0044	Rent a Car, Santry Business Park, Swords Road	350	Grant Permission	Condition No. 2 (FCC) – Car storage facility (Car Hire) is not be used as a commercial car park or as a park and ride facility.
F16A/0479	The Premier Inn Hotel, Airside, Swords	195 (Total Spaces to be provided within application site)	Grant Permission	Condition No. 4 (FCC) – Car parking shall only be used for hotel-related parking and shall not be used for airport only parking.
F16A/0446	Radisson Blu, Dublin Airport	86	Grant Permission	Condition No. 3 (FCC) – Car parking at hotel is only for hotel related parking and shall not be used for airport-related parking.
F16A/0437	The Clayton Hotel Dublin Airport	Removal of 27 spaces from existing car park (340 remaining)	Grant Permission	Condition No. 5 (b) (FCC) – Car parking at hotel is only for hotel related parking and shall not be used for airport-related parking.
F16A/0447	Radisson Blu Hotel, Dublin Airport		Grant Permission	Condition No. 3 - Car parking at hotel is only for hotel related parking and shall not be used for airport-related parking.
F06A/0968	Wrights Venue, Airside Retail Park	c.273	Grant Permission	Condition NO. 7 – The underground car parking shall be used to solely serve the proposed development and shall not be sub let, sold or otherwise.

Table 2 – Applications where parking for airport use has been prohibited by the Planning Authority.

Table 2 above clearly indicates that the Planning Authority have prohibited airport parking for development proposals within the vicinity of Dublin Airport where parking is to be used exclusively for the use of the permissions and not for Dublin Airport.

In addition to Table 2 above, a permission to amend a multi-storey car park and hotel previously permitted by An Bord Pleanála under Ref. PL06F.PA0008 was refused under the amendment application, ABP Ref. 06F.PM0005.

The proposed alteration relates to the use of the 400 no. 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."

In light of the above, it is evident that the Planning Authority and An Bord Pleanála have prohibited airport parking for development proposals within the vicinity of Dublin Airport such that parking is to be used exclusively for the use of the permissions and not for Dublin Airport.

6.4 Assessment of Car Parking at Dublin Airport

Under Condition 23 of the Terminal 2 permission Reg. Ref. F06A/1248 and An Bord Pleanála Ref. PL06F.220670, it was confirmed that the long-term car parking requirements for Dublin Airport is 26,800 car parking spaces which is necessary and appropriate for the operation of Dublin Airport.

The three authorised long-term car parks approved for Dublin Airport provide for a total of 25,420 car parking spaces which is below the limit of 26,800 spaces applied under Condition 23 attached to the Terminal 2 permission.

As previously noted, the <u>only authorised car parks</u> serving Dublin Airport and providing long term car parking are Quickpark and the DAA Holiday Red and Express Blue Car Parks, all of which have been previously approved under the Strategic Infrastructure Development procedure. The demand for long

term car parking serving the Airport has not reduced in the period since the last temporary permission for Quickpark. In fact, it is considered that this demand has increased noting the significant increase in passenger numbers over the last number of years with 29.6 million passengers using Dublin Airport in 2017. Passenger numbers are now at a comparable level to that predicted when the Terminal 2 permission (32 million passengers per year) was granted and thus it has already been established in the Terminal 2 assessment that this level of patronage requires 26,800 long-term car parking spaces in order to ensure the efficient function and operation of the Airport and to ensure the successful operation of the Irish Economy.

It is further submitted, that the granting of permanent planning permission for Quickpark, will not adversely impact on the transition to sustainable transport modes. Dublin Airport has continued to encourage passengers to utilise public transport modes and the Dublin Airport's Mobility Management Update 2017 identified that 56% of passengers utilised either bus or taxi to access the Airport. However, it still remains that 46% accessed the Airport by private car. Public transport is not a readily available option for those accessing the airport such as passengers from country areas that don't have access to frequent services or where there are no services, and indeed early morning and late flights where public transport is less frequent or unavailable. The introduction of Metro North and Bus Connects will not reduce the demand for car parking noting that the airport has a national catchment whereby passengers from outside the Greater Dublin Area may not have access to public transport. It must be noted, that 53.4% of passengers travel from outside of Dublin and the DAA's Mobility Management Plan Update 2017 indicates that a variety of transportation choices including long term car parking is required to serve Dublin Airport's extensive catchment area.

Therefore, it is clear that there remains a requirement for long term car parking to ensure the efficient use of the airport. National, Regional and Local planning policy seeks to ensure the safeguarding of the current and future operation of Dublin Airport and therefore access needs to be facilitated by a range of means including private car. In this regard, Quickpark is a necessary and key surface access infrastructure that supports the ongoing operation of the Airport and accordingly it is submitted to the Board that the proposed development is in accordance with the Terminal 2 permission.

7.0 Fingal Development Plan 2017-2023

The subject site is located within the administrative area of Fingal County Council, and the statutory development plan is the Fingal Development Plan 2017-2023 The Development Plan's policies and objectives provide the direction for the future development of the County and have been taken into account in the preparation of the current application.

7.1 Land Use Zoning

Under the Fingal County Development Plan 2017-2023, the subject lands are zoned 'GE' - General Employment. Part of the subject site is also located within an 'Inner Public Safety Zone'. The objective for 'GE' zoning seeks to:

"Provide opportunities for general enterprise and employment".

The stated vision for 'GE' zoned lands is as follows:

"The purpose of the General Employment (GE) zoning is to facilitate opportunities for general employment uses and compatible forms of industry, logistics and warehousing. The GE zoning is the largest economic development zoning in Fingal with over 1,850 ha of GE zoned lands located principally in Blanchardstown and Balbriggan, with notable zonings in locations such as Dardistown, Cloghran, and Baldoyle".

The subject site has a 'Specific Objective' in Development Plan as a 'Car Park (CP)' (Refer to Fig 10 below). It is therefore submitted that the proposed use is considered in accordance with the land use zoning pertaining to the lands and is an appropriate use for the lands.

The 'GE' zoning identifies 'Office Ancillary to Permitted Use' as a permitted in principle land use under the zoning objective. It is submitted that the inclusion of the office and ancillary services pertaining to the development proposal is an appropriate land use under the provisions of the Fingal Development Plan 2017-2023.

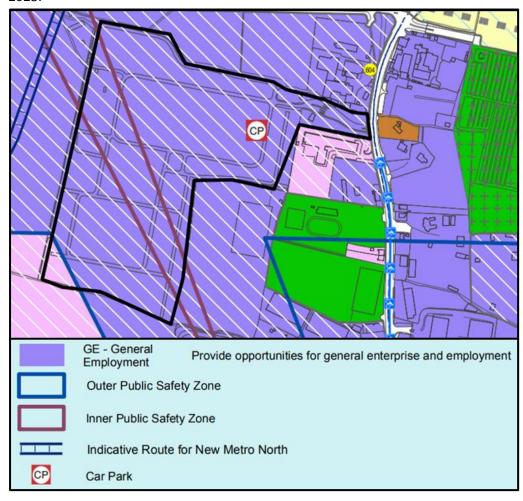


Fig 10 – Fingal Development Plan 2017-2023: Maps Fingal South – Sheet No. 11) (Source: Fingal Development Plan 2017-2023)

7.2 Fingal Development Plan and Dublin Airport

The Fingal Development Plan 2017-2023 identifies Dublin Airport as a main 'Strategic Policy' as part of Development Plan policy. It states that:

"Strategic Policy No. 9 – Safeguard the current and future operational, safety, and technical requirements of Dublin Airport and provide for its ongoing development within a sustainable development framework of a Local Area Plan. The plan shall take account of any potential impact on local communities and shall have regard to any wider environmental issues."

Following on from the Strategic Policy outlined above, the Fingal Development Plan 2017-2023 contains a number of primary objectives where proposals supporting the protection, maintaining and enhancing of Dublin Airport and ancillary and support services is encouraged.

Objective DA01 – Facilitate the operation and future development of Dublin Airport, in line with Government policy, recognising its role in the provision of air transport, both passenger and freight.

Objective DA03 – Safeguard the current and future operational, safety, technical and developmental requirements of Dublin Airport and provide for its ongoing development within a sustainable development framework, having regard to both the environmental impact on local communities and the economic impact on businesses within the area.

Objective ED31 – Ensure that the required infrastructure and facilities are provided at Dublin Airport so that the aviation sector can develop further and operate to its maximum sustainable potential, whilst taking into account the impact on local residential areas, and any negative impact such proposed developments may have on the sustainability of similar existing developments in the surrounding area, and the impact on the environment, including the climate.

Objective ED32 – Ensure an appropriate balance is achieved between developing the unique potential of Dublin Airport as an economic generator and major employer in the County and protecting its core operational function as the Country's main international airport.

Objective DA22 – Control the supply of car parking at the Airport so as to maximize as far as is practical the use of public transport by workers and passengers and to secure the efficient use of land.

Objective DA24 – Protect and enhance the transportation capacity required to provide for the surface access needs of the Airport.

Objective DA25 – Maintain and protect accessibility to the Airport as a priority.

Objective MT35 – Promote and support the provision of Park and Ride facilities at suitable locations near high capacity public transport stations/stops.

Objective ED30 – Engage and collaborate with key stakeholders, relevant agencies and sectoral representatives to ensure that Dublin Airport is developed and promoted as a secondary hub to capitalise on the associated wider economic benefits for Fingal and the wider region.

The proposed development will not conflict with Fingal Development Plan's main 'Strategic Policy' and the primary policy objectives. The use is complementary to the operation of Dublin Airport and will support in achieving the primary aims and objectives of the Development Plan.

7.3 Specific Objectives – Fingal Development Plan 2017-2023

7.3.1 Public Safety Zones

Under the Fingal County Development Plan 2017-2023, the lands within and surrounding Dublin Airport are subject to specific safety requirements under Objective DA14 which states:

Objective DA14 – Review Public Safety Zones associated with Dublin Airport and implement the policies to be determined by the Government in relation to these Public Safety Zones.

A large section of the application site is located within a 'Outer Public Safety Zone' with the 'Inner Public Safety Zone' transecting the application site in a north to south direction.

There are a number of development management restrictions associated with the various Public Safety Zones (PSZ's), surrounding Dublin Airport. The purpose of PSZ is to protect the public on the ground from the small but real possibility that an aircraft might crash in a populated area. Essentially, a PSZ is used to prevent inappropriate use of land where the risks to the public is greatest.

According to the report from ERM (2005), the likelihood of an accident in the outer safety zones is less than in the inner zones, and future development will be permitted, subject to a number of restrictions. High density housing development and the building of schools, hospitals and facilities attracting large numbers of people will not be permitted. Car parks are permitted in the Outer PSZ. A car park is permitted as persons are normally expected to park their car and then leave the car park development. Furthermore, car parks are also permitted within the Inner Public Safety Zone with the Erm Public Safety Report specifically stating that:

"The only exceptions for permitted developments in the inner PSZ are:

- developments where persons are not expected to be present;
- long stay car parks (i.e. greater than 24 hours), provided that persons are normally expected to park their car and then immediately leave the car park development. Buildings associated with car parks are subjected to the guidance given in Table 6.1; and
- roads and railways where vehicles and passenger trains/trams are not expected to be stationary. For example, road vehicles can be expected to be stationary at major road intersections, junctions and traffic lights. Therefore, major road intersections, junctions, traffic lights and similar should not be permitted in the inner PSZ."

The information contained in Table 3 below is taken from Table 6.1 of the Environmental Resources Management (ERM) report of 2003, which pertains to the Outer Public Safety Zone permitted developments.

Permitted Developments	Outer Public Safety Zone (PSZ)	
Housing	≤ 60 persons/half hectare	
Holiday Accommodation	≤ 100 beds per development	
Retail/Leisure Facilities	≤ 85 persons/half hectare	
Working Premises	≤ 110 persons/half hectare	
Institutional Accommodation	No further development	
Sports Stadia	No further development	
Limited Use	≤ 220 persons/half hectare	

Table 3 Development restrictions within Outer Public Safety Zone. (ERM 2003)

The proposed entrance office building is located within the Outer Public Safety Zone and is therefore permitted subject to a population of 110 persons per half hectare. In this regard, the applicant wishes to confirm that the population of the proposed entrance building will be c. 40 persons and does not exceed the 110 persons per half hectare (noting the overall site area of 16..9 hectares). The proposed development is therefore in accordance with the Inner and Outer Public Safety zone policies and in accordance with the proper planning and sustainable development of the area.

Fingal County Council sees the Dublin Airport area as a -

- Gateway to Dublin, Fingal and Ireland; South Fingal is a focus for national transport infrastructure with the Airport as the key, and the M50 and M1 as two of the nation's most important road links.
- A hub of the regional economy with the dynamic presence of the Airport, but also astride the Dublin-Belfast Economic Corridor, and close to vital development land around Blanchardstown and Swords.
- Fingal County Council recognises that the Airport is of international and national importance and represents the most significant single economic entity in Fingal and that of the region.

The proposed development is therefore in accordance with the land use zoning pertaining to the lands and is in accordance with the safety restrictions associated with the lands. The continued use of the car park on a permanent basis is therefore the most appropriate land use for the lands, is plan led and is strategically located in close proximity to Dublin Airport.

7.3.2 Indicative Route for MetroLink (Metro North)

The Fingal Development Plan Zoning Map illustrates the indicative route for the proposed Metro North project. It will be situated directly west of the application site with the Dardistown Metro Stop located within 400 metres of the western perimeter boundary.

It is understood that as part of the MetroLink project, which is a revised proposal for the Metro North, it will follow the indicative Metro North route where the primary objective is to link Swords and Dublin Airport to the City Centre. It is currently in the public consultation process. The MetroLink's preferred route is to locate an underground route with Dardistown Station to the south west of the application site with the metro route traversing the north western section of the application site in a north to south direction. The Option B proposal is to consist of a large station a surface depot with a surface route located within close proximity of the western section of the application site.

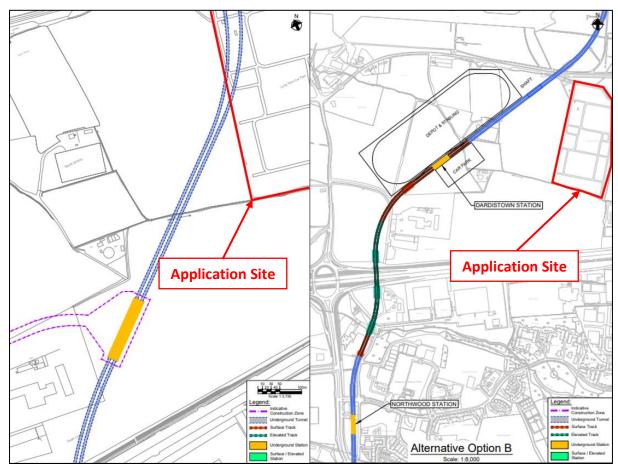
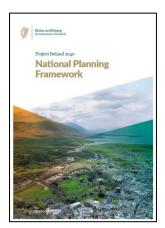


Fig 11. (Left) – Preferred option for the Dardistown Station and route for the MetroLink Project & Fig 12. (Right) Option B for the Dardistown route and station as part of the MetroLink Project

It is submitted that the proposed QuickPark application considers the proposed MetroLink route and is not directly affected by the proposed development as the route is underground. The provision of metrolink does not reduce the demand or requirement for long term car parking spaces as noted within this report and within the EIAR accompanying the application. In the intervening period since the assessment of the Terminal 2 permission, the demand for long term parking has not decreased, the catchment of the airport has not changed (i.e. the airport provides for a national catchment whereby outside the Greater Dublin Area where public transport is not always a viable or indeed available method of public transport), the provision of Metrolink and Bus Connects will not affect the demand for long term car parking and indeed the Airport is increasing passenger capacity such that the demand for car parking remains as that assessed in 2006. Therefore, it is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area and will support surface access infrastructure serving Dublin Airport.

8.0 National Policy

8.1 National Planning Framework (Project Ireland 2040)



The National Planning Framework (NPF) is the new national planning policy document. It replaced the previous National Spatial Strategy (NSS) as the primary national policy framework. Announced in 2018, the NPF is designed to improve the effectiveness of public investment in infrastructure and other relevant services around the county, including the enhancement of regional and international connectivity.

Due to Dublin's status as the primary commercial and administrative centre on the island of Ireland, Dublin Airport is a crucial factor in providing connectivity to both national and international markets. The NPF recognises the importance of the airport to the country and the Dublin

Region in particular. The 'Shared Goals – Our National Strategic Outcome' of the NPF states that investment in airports is to be prioritised in order to maintain Ireland's international competitiveness:

"This is crucial for overall international competitiveness and addressing opportunities and challenges from Brexit through investment in our ports and airports in line with sectoral priorities already defined through National Ports Policy and National Aviation Policy and signature projects such as the second runway for Dublin Airport and the Port of Cork - Ringaskiddy Redevelopment".

The National Aviation Policy is a specific policy document that aims to enhance Ireland's connectivity by ensuring aviation access is achieved in a safe and responsive manner in order to meet the requirements of business and tourism related demand. For further information, please refer to Section 8.3 below.

Dublin Airport is situated within the strategic Dublin-Belfast Economic Corridor. This corridor is the main access point to the island with three major airports, Dublin Airport, Belfast International Airport and Belfast City Airport where they collectively manage over 35 million passengers each year. It is forecast that passenger numbers over the coming years will continue to rise, particularly at Dublin Airport where the new north runway, estimated to be completed and operating by 2021 will improve flight frequency and connectivity to European and International markets. In addition to the above, the NPF states that land uses within the vicinity of Dublin Airport is critical in achieving future airport needs where the NPF states that under the 'National Strategic Outcome 4', it is the objective to implement the following:

"Careful land-use management of land-side areas to focus on the current and future needs of the airports."

It is submitted that the requirement for long-term car parking is an essential component in sustaining the operational capacity of Dublin Airport, where car parking is needed to facilitate for current demand and the long-term projected growth. The new north runway will be a fundamental factor for

Dublin Airport's continued growth with the car park acting as an important ancillary use to the airports expansion plans. High quality international connectivity is a strategic objective.

8.2 National Development Plan 2018-2027 (Project Ireland 2040)



The National Development Plan 2018-2027 (NDP) is an integrated policy document as part of the National Planning Framework (NPF). The NPF outlines the national strategic objectives to be achieved with the NDP illustrating the committed investment in implementing the NPF's objectives. Dublin Airport is identified as a key strategic investment area as part of the NDP funding. This relates to the second runway and visual control tower, all of which aim to encourage in developing the airport as a key international hub. The new visual control is to be completed by 2019 and the new north runway is estimated to be completed and operating by 2021. All supporting services in achieving this goal is to be facilitated and encouraged.

8.3 National Aviation Policy for Ireland (2015)



In August 2015, the Department of Transport, Tourism and Sport issued A National Aviation Policy for Ireland. It is the primary goal of the National Aviation Policy to:

"enhance Ireland's connectivity by ensuring safe, secure and competitive access responsive to the needs of business, tourism and consumers."

The National Aviation Policy aims to expand and develop Dublin Airport into a 'Secondary Hub' where increased connections are a key priority in order to facilitate growing passenger numbers. The proposed new north runway will facilitate in this goal being achieved.

In response to the above statement, the requirement for long-term car parking is an essential component in sustaining the operational capacity of Dublin Airport, where car parking is to facilitate for current demand and the long-term projected growth. With the airport projecting increased passenger growth and a key objective to develop as a secondary hub, facilities for long term car parking will need to be provided in order to achieve this objective.

9.0 Regional Policy

9.1 Regional Planning Guidelines for The Greater Dublin Area 2010-2022

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 is the statutory regional policy document applicable to the application site. The document states that Dublin Airport is the primary international air access point for the State. Under Strategic Recommendation ER7 it is the objective to achieve the following;

Strategic Recommendation ER7 – Promote and support the role of Dublin Airport as the 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 future airport capacity needs and by improved transport linkages to the city and region.

The Greater Dublin Area (GDA) Regional Planning Guidelines (RPGs) state that the Greater Dublin Area, through its ports and airport connections will continue to be the most important entry/exit point for the country as a whole, and as a Gateway between the European Union and the rest of the World. Access to, and through, the GDA will continue to be a matter of national importance. The RPGs also state that:

'An efficiently functioning, well connected airport is a key competitiveness factor for Dublin, the wider region and the state.'

In relation to transport, the GDA RPGs states that the airport's connections to the city and the region requires further consideration, and in this regard, the throughput of passengers from the airport to their final destinations in the city, region and country via local and national transport networks is an area of key consideration for future development.

The airport is intended as one of the principal stops on the proposed MetroLink (Revised from Metro North Project), which connects Swords and Dublin Airport to Sandyford via the City Centre. This service would provide a high capacity, high speed connection from the airport to the city centre, feeding local, regional and national public transport hubs, improving the connectivity and operation of the airport.

The Guidelines indicate that in order to deliver the GDA as an attractive international destination for business, the 'critical mass' concept should be a core objective, supported by density levels which support competitiveness, sustainability and create opportunities for economies of scale to justify first class and strategic infrastructure provisions and to take full advantage of international transport hubs such as Dublin Airport and Dublin Port.

In this regard, policy objective ER7 seeks to promote and support the role of Dublin Airport as the 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 future airport capacity needs and by improved transport linkages to the city and region.

In order to ensure the continued viability of Dublin Airport as an international transport hub it is important that:

- A high capacity public transport system between the city area and the airport is developed
- Protection is given to linkages to the high quality and high capacity road network surrounding the Airport Area
- That lands are reserved to cater for possible long-term future passenger/cargo growth and airport expansion
- The Inner and Outer Airport Noise and Public Safety Zones and Approach Zones are suitably protected through Development Plan and Local Area Plans policies and zoning.

In addition, Policy Objective PIR7 states that the relevant Local Authorities should include provisions and zoning policies which support the delivery of high quality transport links to Dublin Airport; ensure that suitable lands are appropriately zoned to allow future expansion and restrict inappropriate development. It is submitted that the Quickpark Car Park will adhere to Regional Planning Guidelines where it will support existing airport demand, future airport expansion proposals and projected passenger growth.

9.2 Transport Strategy for the Greater Dublin Area 2016-2035



This National Transport Authority Strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area up to 2035. The Strategy presents the transport requirements for the GDA based on principles of effective, efficient and sustainable travel.

The Strategy states that protecting and enhancing access to the ports and Dublin Airport is a strategic priority where its strategic location along the motorway network allows improved access to the Region and State. The Strategy focuses on improving public transport connections to Dublin Airport while protecting existing services to the Airport. It is submitted

that the Quickpark car park is fundamental to the operation of Dublin Airport and will provide for a key long-term car park to facilitate current passenger demand and future airport passenger growth.

10.0 Local Policies & Objectives

10.1 Fingal North Dublin Transportation Study (June 2015)



The National Transport Authority (NTA) commissioned consultants to conduct the Fingal / North Dublin Transportation Study which aimed to identify the optimum long-term public transport solution to connect Dublin City Centre, Dublin Airport and Swords. It stated that providing a high capacity public transport link along this corridor has been a long-term objective for the area.

It is submitted that car parking is a fundamental attribute providing improved connections to the airport. The QuickPark will provide for an appropriate car park development on an existing car park site and will represent a sustainable use of airport lands located directly adjacent to the

main southern runway.

10.2 Dublin Airport Central Masterplan (March 2016)

Although the application site is not located within the Central Masterplan Area, it contains a number of fundamentals that is applicable to the car park site. In relation to Long-Term Car Parking spaces, the Masterplan states the following:

"Long-Term Car Parking Spaces – There are currently 25,280 long-term car parking spaces serving Dublin Airport. Under Condition 23 of the grant of permission for the Terminal 2 development, the number of long term car parking spaces is restricted to 26,800. In total 19,040 of these spaces are controlled by the daa and 6,240 spaces are provided by a private operator 'QuickPark'. The long-term car parks are remote from the terminal buildings and passengers making use of these car parks are transferred via shuttle buses (frequency varies in between 8-15 minutes) to and from the terminal buildings. The transfer times from these car parks vary depending on their location but all travel times are in the range of 5-10 minutes".

The Dublin Airport Central Masterplan states that long term car parking facilities is are located in remote locations away from the main terminal building. The Masterplan states that the total number of long term car parking spaces being provided is significantly below the threshold set by Condition 23 of the grant of permission for the Terminal 2 development, where the number of long term car parking spaces is restricted to 26,800. This includes the Quickpark site and the Red and Blue long-term car parks operated by DAA.

10.3 Dardistown Local Area Plan 2013-2019

The lands at the Quickpark, Cloghran are situated within the Dardistown Local Area Plan. The Dardistown Local Area Plan 2013-2019 identifies a number of policies and objectives in relation to development within the inner and outer Public Safety Zones and Noise Zones around Dublin Airport. Furthermore, the Dardistown Local Area Plan applies a specific car park objective to the Quickpark lands and acknowledges Quickpark as an airport related car park facility.

The LAP states that the GE zoned lands will primarily be used for the Depot, Warehousing & Distribution, Airport Car Parking and Park and Ride. The car parking elements are there to promote mode transfer to bus and Metro and therefore are regarded differently. These allow for the transfer of the driver on-to public transport modes to be transported to the airport and city centre. While they generate traffic locally, they help reduce traffic at more sensitive locations and help underpin sustainable travel modes. Therefore, this element of traffic generation should be regarded as supportive of Smarter Travel solutions and not as a traffic impact.

It must be noted that there are a significant number of relevant policies and objectives pertaining to car parking and development around the airport outlined in each of the Local Area Plans and Draft Airport Masterplan. The importance of providing adequate car parking facilities for the expanding and growing airport is highlighted throughout the relevant planning documents. The statutory documents seek to ensure that the infrastructural capacity of the airport increases in line with the growth of air services and that the safe and efficient transfer of passengers to and from the airport by transportation modes including the private car is a central component of the operation of Dublin Airport.

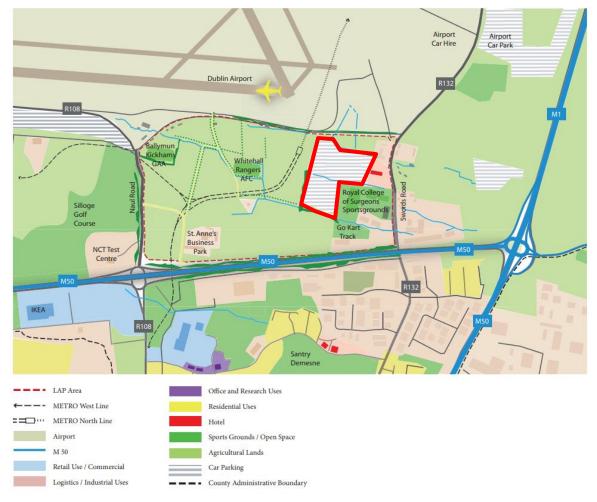


Fig 13. Map extract from Dardistown LAP indicating Quickpark as an existing car park

11.0 Engineering Proposals

Water Moylan Consulting Engineers have prepared an Engineering Assessment Report, which is submitted under a separate cover in support of this planning application. This deals with surface water drainage, foul water and potable water supply while they also prepared a separate flood risk assessment as part of the Engineering Assessment Report.

Surface Water Drainage

The existing storm water management policy implemented on the site has been reviewed in terms of the latest guidelines set out in the Greater Dublin Strategic Drainage Study (GDSDS). The development provides permeable surfaces within the proposed car park with a gravel and sand filter to provide storage in order to clean and to retain the storm water runoff. Pollutant removal occurs within the sub-base material itself and by the filtering action of the reservoir. In addition, silt trap manholes and petrol interceptors are provided at each outfall to the existing ditch system to contain hydrocarbons and potential spillages. Please refer to the enclosed engineering report for further details.

Foul Drainage

The proposal is to connect the new building to the existing 375mm diameter private foul water which connects to an existing 900mm diameter sewer in the R132 Swords Road. The existing 900mm diameter pipe running along the Swords Road receives an additional 6.2 m3/day of untreated effluent with a peak flow of 0.45 l/s (6 DWF) as a result of the development. This additional flow is negligible in terms of the pipes capacity.

Potable Water

The proposed infrastructure includes the existing water supply network that serves the control building and adjacent fire hydrants. It is proposed to install a section of 100mm diameter watermain to the existing 100mm main that runs adjacent to the entrance road, connecting to the existing 150mm trunk watermain running along the R132 Swords Road.

Flood Risk Assessment

Water Moylan Consulting Engineers carried out a Flood Risk Assessment as part of the proposed development. With reference to Water Moylan's Flood Risk Assessment contained with the Engineering Assessment Report, a summary of the potential flood risk is outlined as the following:

Tidal – there is no risk of tidal flooding in this area.

Fluvial – There is a residual risk of some potential flooding from the watercourse to the north of the development lands due to excessive run off from the airport environs during extreme conditions. However this risk is low and flood water can be accommodate.

Surface Water – Due to the restricted runoff from the subject lands there is a risk that surface water accumulating within the site will result in minor local surface flooding within the low points of the site during extreme storm events.

Ground Water – There is no known history of springs in the area. The likelihood of ground water flooding for the subject lands is very remote.

Human/Mechanical – In the event of the outfalls from the site blocking due to lack of maintenance surcharge water will be stored on site during the storm event increasing the depth of the retained waters on the site.

It is therefore submitted that there is little or no risk of Tidal, Fluvial, Surface, Groundwater or Human/Mechanical flooding. It is therefore our opinion that the risk of flooding at this site and the risk of flooding due to the development of this site in flood events is minimal.

12.0 Environmental Considerations

Due to the nature of the proposed development, an Environmental Impact Assessment Report (EIAR) is required as part of the proposed application. Following pre-planning consultations with An Bord Pleanála, it was noted that a Natura Impact Statement may be required. Accordingly, the applicant

engaged Openfield Ecological Services to prepare a Natura Impact Statement which is enclosed with the planning application pack.

The Natura Impact Statement states that there are no Natura 2000 sites within this radius. Water courses however drain to Baldoyle Bay, which is a SPA and SAC. In addition to these European designations, Baldoyle Bay is also recognised as a wetland of international importance under the RAMSAR Convention (site 25/10/88). It is also a proposed Natural Heritage Area, a designation under national legislation. The SAC and SPA in Baldoyle are connected to the project via the Mayne River. Wastewater from the development passes to the municipal sewer for Dublin City at Ringsend, and the point of discharge from this facility is also within a SAC and SPA.

Surface water falling on the car park drains to ditches which pass to the Mayne River. The system which is in place complies with the Greater Dublin Strategic Drainage System (GDSDS) and includes on-site storage with excess discharge via oil/grit interceptors and flow control devices. No impacts to surface water is therefore occurring.

Water quality testing has been carried out during 2018 at a number of locations upstream of, within and downstream of the site. These were analysed for a range of standard pollutants. The data showed that no samples exceeded WHO drinking water limits for Total Petroleum Hydrocarbons (TPH), although one sample exceeded the 200ug/I limit set under the Surface Water Regulations 2009. A number of results, indicative of human or animal waste contamination, were found in surface water samples upstream and downstream of the car park. On foot of these results, a thorough foul water cross-connections investigation was conducted by Liffey Developments in August 2018. No cross connections were identified. It has been concluded that the source of the contamination does not originate from the quickpark site.

The NIS states that the proposed development is not located within or directly adjacent to any SAC or SPA but pathways do exist to a number of these areas. An assessment of the aspects of the project has shown that significant negative effects are not likely to occur to these areas either alone or in combination with other plans and projects. The NIS concludes stating that the project will not adversely affect the integrity of any Natura 2000 site. Please refer to the enclosed NIS for further details.

The Environmental Impact Assessment assesses the impact, if any of the proposed development on the surrounding environment. The EIAR confirms that there will be no significant impacts on the surrounding environment as a result of the continued use of the car park on a permanent basis. Please refer to the enclosed EIAR for further details.

13.0 Conclusion

The proposed continuation of use of the existing car park on a permanent basis and the provision of a new entrance buildings represents an appropriate development for the subject site and will ensure the sustainable use of lands through the consolidation of development at an appropriate scale and location. The proposed development is permitted under the zoning objectives for the land particularly the specific objective to provide for a car park under the Fingal County Development Plan 2017-2023.

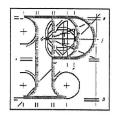
It is submitted that the proposal is in accordance with the proper planning and sustainable development of the area and offers an efficient use of land in close proximity to Dublin Airport noting

the public safety zones pertaining to the lands and the restriction of certain types of development on same. It is clear that there remains a requirement for long term car parking to ensure the efficient use of the airport. National, Regional and Local planning policy seeks to ensure the safeguarding of the current and future operation of Dublin Airport and therefore access needs to be facilitated by a range of means including private car. In this regard, Quickpark is a necessary and key surface access infrastructure that supports the ongoing operation of the Airport and accordingly it is submitted to the Board that the proposed development is in accordance with the Terminal 2 permission. The delivery of 6,122 long term car parking spaces is in accordance with the requirements for the safeguarding of Dublin Airport.

In light of the foregoing, Downey Planning trust that the enclosed plans and particulars pertaining to this planning application are in order and thus respectively request that An Bord Pleanála grant planning permission in this instance.

Appendix 1 Strategic Infrastructure Decision 2011 Ref. 06F. PA0023

An Bord Pleanála



STRATEGIC INFRASTRUCTURE DEVELOPMENT

PLANNING AND DEVELOPMENT ACTS 2000 TO 2011

An Bord Pleanála Reference Number: 06F.PA0023

(Planning Authority: Fingal County Council)

APPLICATION for permission under section 37E of the Planning and Development Act, 2000, as amended, in accordance with plans and particulars, including an environmental impact statement, lodged with An Bord Pleanála on the 6th day of April, 2011 by Gerard Gannon, care of Downey Hynes Partnership of 11 Merrion Square, Dublin.

PROPOSED DEVELOPMENT: Continuation of use of an at-grade long term car park (comprising 6240 number spaces) on lands known as the Quickpark Car Park, Turnapin Great, Swords Road (Old Airport Road), Santry, County Dublin. The lands are currently used for the same purpose under and in accordance with temporary permissions granted under planning register reference number F99A/0376 / appeal reference number PL.06F.112955, planning register reference number F02A/1110. planning register reference number F05A/1464 and planning register reference number F06A/1746. The site is located within the townland of Turnapin Great, Swords Road (Old Airport Road), Santry, County Dublin. The proposed development includes ancillary infrastructure and facilities, as follows: existing internal circulation road; hard-standing; maintenance shed; lighting; boundary fencing; ticket machines; car park barriers; electrical kiosks; control building with public and staff welfare facilities; bus shelters; CCTV cameras; signage; culverts; biocycle waste water treatment system and percolation area; landscaping works; and all ancillary works necessary to facilitate the development erected under and in accordance with planning register reference number F99A/0376 / appeal reference number PL.06F.112955. planning register reference number F02A/1110, planning register reference number F05A/1464 and planning register reference number F06A/1746. The development also includes new ancillary infrastructure and facilities / drainage improvement works including provision of four number petrol interceptors on existing surface water drainage system, new 150 millimetre foul sewer to existing 375 millimetre mains sewer on Swords Road and reinstatement of land drain with riparian corridor, two number culverted vehicular bridges and associated landscaping. Access to the car park is from a previously permitted signal controlled junction on the Swords Road (Old Airport Road) with turning lanes and directional signs. The total site area for the



proposed development is 16.9 hectares (41.8 acres). This application is for a temporary permission for a period of seven years. This application is accompanied by an environmental impact statement. Planning permission is also sought for the retention of the existing canopy located at the entrance / egress ticket booths.

DECISION

GRANT permission under section 37G of Planning and Development Act, 2000, as amended, for the above proposed development in accordance with the said plans and particulars based on the reasons and considerations under and subject to the conditions set out below.

DETERMINE under section 37H(2)(c) the sum to be paid by the applicant in respect of costs associated with the application as set out in the Schedule of Costs below.

MATTERS CONSIDERED

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included the submissions and observations received by it in accordance with statutory provisions.

REASONS AND CONSIDERATIONS

Having regard to:

- (a) the provisions of the Fingal Development Plan 2011-2017,
- (b) the provisions of the Dublin Airport Local Area Plan, 2006,
- (c) the existing temporary car park and infrastructure in place and the limited duration sought,

and to the nature of the development, which includes specific measures to reduce the risks of pollution and flooding, it is considered that, subject to compliance with the conditions set out below, the continuance of use of the car park and the proposed additional works would not seriously injure the amenities of the area, would not give rise to a traffic hazard, would not have an adverse impact on the environment and would not adversely impact on a Natura 2000 site. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.



CONDITIONS

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require points of detail to be agreed with the planning authority, these matters shall be the subject of written agreement and shall be implemented in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. Planning permission is hereby granted for a temporary period of seven years and at the end of this period the use of the lands shall cease unless, prior to the end of the period, planning permission shall have been granted for a further period.

Reason: In the interest of clarity and to allow for a future assessment of demand for long-term car parking spaces serving Dublin Airport in the light of the circumstances then prevailing.

3. Within three months of the date of this order, the developer shall submit to the planning authority for written agreement a revised car park layout of the entire site which includes the drainage revisions. The drawing shall include car park space numbers.

Reason: In the interest of clarity.

4. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services, details of which shall be agreed in writing with the planning authority within three months of the date of this order, and such works shall be carried out within six months of the date of this order.

Reason: In the interest of public health and to ensure a proper standard of development.

- 5. The developer shall submit the following information to the planning authority for written agreement prior to commencement of drainage improvement measures.
 - (a) Full details of decommissioning of existing waste water treatment plant.
 - (b) Full details of an inspection and maintenance scheme for the silt traps and petrol interceptors.

Reason: In the interest of public health, water quality and to ensure a proper standard of development.



6. The developer shall provide an automatic system for counting traffic entering and leaving the car park and for calculating the number of free spaces within the car park. This data shall be made available in real time to the planning authority's parking guidance system.

Reason: In the interest of the proper planning and sustainable development of the area and to ensure a co-ordinated approach to the management of long-term car parking facilities at Dublin Airport.

7. The developer shall provide facilities for the charging of electric cars within the car park, details of which shall be agreed in writing with the planning authority within three months of the date of this order, and such works shall be carried out within six months of the date of this order.

Reason: In the interest of the sustainable transport and the proper planning and sustainable development of the area.

8. The site boundaries shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority. Where existing planting has declined, reinstatement/supplementary planting shall be provided.

Reason: In the interest of visual amenity.

9. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to the commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála for determination.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.



10. The developer shall pay the sum of €62,400 (sixty-two thousand and four hundred euro) (updated at the time of payment in accordance with changes in the Wholesale Price Index – Building and Construction (Capital Goods), published by the Central Statistics Office), to the planning authority as a special contribution under section 48 (2)(c) of the Planning and Development Act 2000, as amended, in respect of providing a Parking Guidance System and associated Variable Message Signs. This contribution shall be paid prior to the commencement of the development or in such phased payments as the planning authority may facilitate. The application of indexation required by this condition shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to the Board to determine.

Reason: It is considered reasonable that the developer should contribute towards the specific exceptional costs which are incurred by the planning authority, which are not covered in the Development Contribution Scheme and which will benefit the proposed development.

SCHEDULE OF COSTS

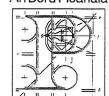
In accordance with the provisions of section 37H(2)(c) of the Planning and Development Act 2000, as amended, the reimbursement of fees by An Bord Pleanála to the applicant amounts to €76,284.

Note: An explanation of the above is set out in the attached Appendix I.

Member of An Bord Pleanála duly authorised to authenticate The seal of the Board.

Dated this 5 day of October 2011.

Appendix 1.



Strategic Infrastructure Development Cost of determining the Application.

File No. 06F.PA0023

Brief Description of Development: Continued operation of the Quickpark Long Stay Car Park, Turnapin Great, Swords Road (Old Airport Road) Santry, Co. Dublin.

Costs incurred by the Board in determining the application.

Board's Costs				
(1)	Cost based on Inspector's time	€23,715.36		
	Application: €15,338.40			
	Pre-application Consultation: €8,376.96			
(2)	Costs invoiced to Board	Nil		
(3)	Total chargeable costs	€23,715.36		
(4)	Application fee paid	€100,000		
(5)	Observer Fees paid	Nil		
(6)	Net amount due to be paid by applicant, or			
(7)	Amount due to be refunded to applicant	€76,284.64		

Member of An Bord Pleanála duly authorised to authenticate the seal of the Board.

Dated this 5 day of october 2011.