

Senior Executive Officer,
Forward Planning Section,
Land Use Planning and Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC

15th September 2021

Dear Sir or Madam,

RE: SOUTH DUBLIN COUNTY DRAFT DEVELOPMENT PLAN 2022-2028

SUBMISSION ON BEHALF OF:

NVD Ltd
Baldonnell
Dublin 22
D22 AV20

1.0 INTRODUCTION

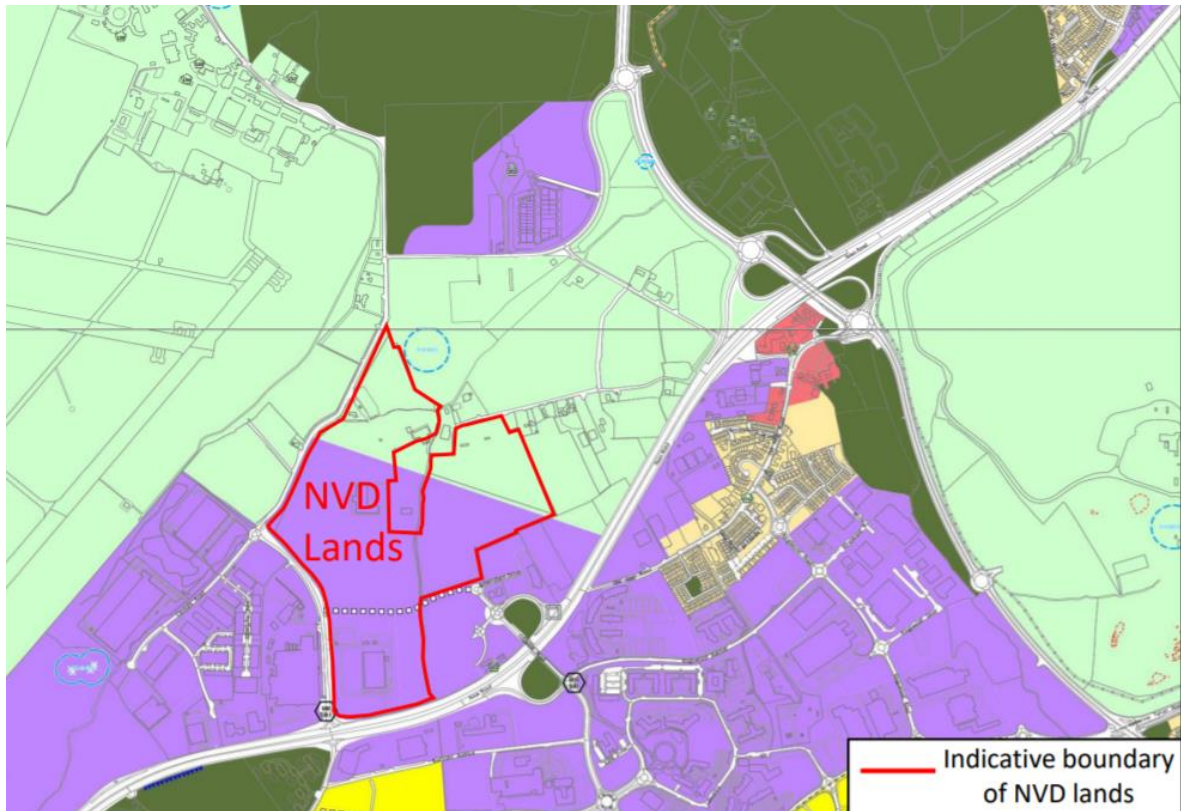
- 1.1. On behalf of our client, we wish to welcome this opportunity to make a submission on the draft County Development Plan. Our client seeks material alterations to the Draft Development Plan as it relates to their land interest, which are set out in Section 3 of this submission.
- 1.2. Our client is in ownership of a significant landholding at Baldonnell, Dublin 22, as outlined on the map overleaf:

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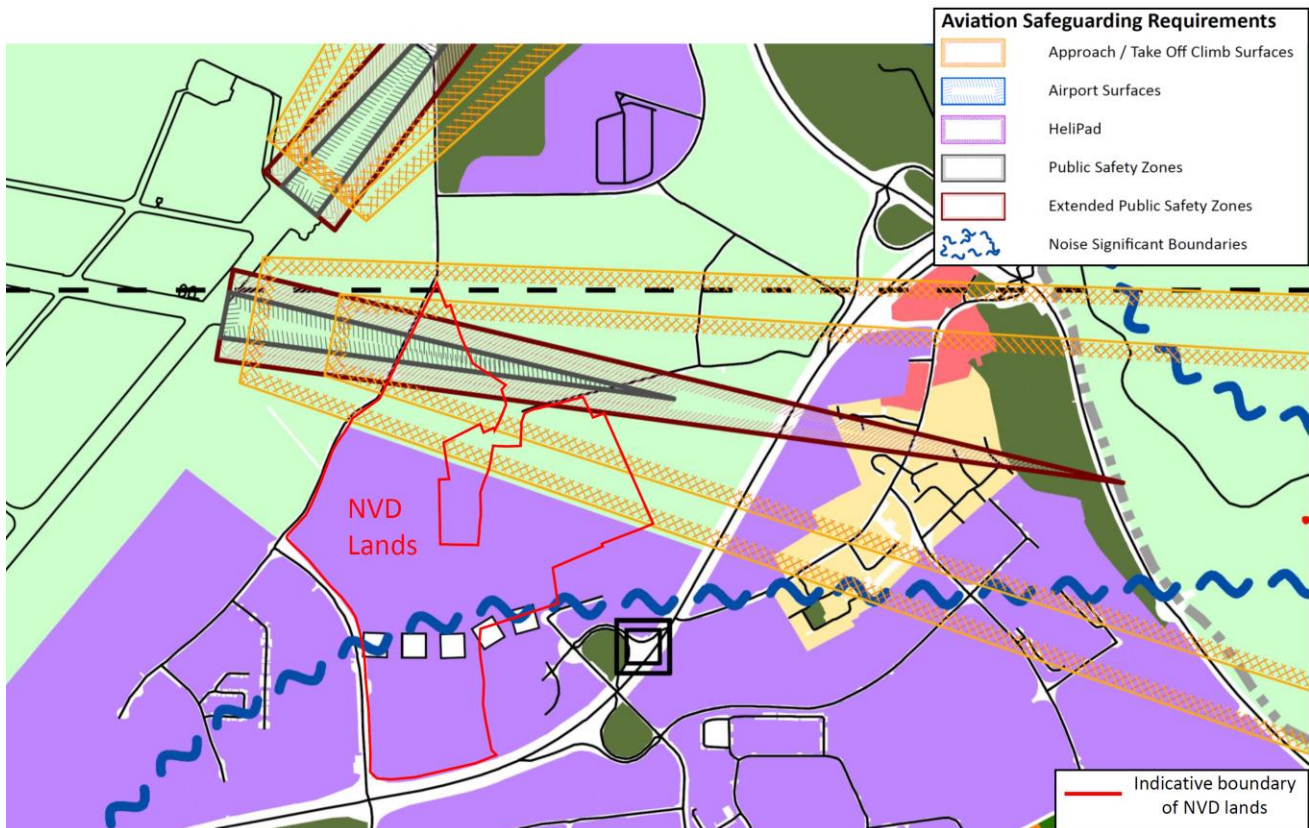
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Approximate outline of NVD lands in red – Extracts of Draft Development Plan Zoning Maps 4 and 8

- 1.3. These lands are used for the storage of vehicles subsequent to arriving in the country, prior to distribution across Ireland.
- 1.4. The lands are located proximate to Casement Aerodrome, and as such there are aviation considerations for any development of the lands. The lands are partly located within an 'Inner Approach Area' and 'Public Safety Zone' as shown below under the draft Development Plan, and it is stated that no development is permissible in these areas.



Extract - SDCC Draft Development Plan 2022 Index Map (approximate outline of lands in red)

1.5. Section 11.7.7 of the Draft Development Plan states:

“Public Safety Zones - General

Additional safety on the ground is provided by means of Public Safety Zones extending from the ends of runways, usually involving (i) an Inner Zone in which no new human occupancy is permitted (although existing occupancy may remain), and (ii) an Outer Zone in which limited occupancy is permitted (with different maximum occupancy figures for different types of development, taking into account likely duration/s of occupancy).

There are currently no set international standards or recommendations regarding Public Safety Zones at airports/aerodromes, and in practice these vary considerably in size at the international airports where they are provided. Public Safety Zones at airports were not mentioned in the recent National Aviation Policy for Ireland (published in 2015 by the Department of Transport, Tourism and Sport).

The Public Safety Zones proposed within the 2009 Review of Policy at Casement Aerodrome were particularly small, and fully contained within the aerodrome’s “Red/ Inner approach areas” (where no new development was permitted in any event), so that those Public Safety Zones had no additional effect.

Public Safety Zones for Casement and Weston

To more accurately make provision for safe air navigation and protection of people on the ground, the prohibition on new development in the immediate vicinity of runway thresholds is transferred to new Inner Public Safety Zones for Casement and

Weston. Pending more detailed review and recalculation based on updated traffic figures, these Inner Public Safety Zones will all be of triangular shape 1000m long by 100m wide (i.e. larger than any of the Public Safety Zones calculated in 2009 for Casement).

In addition, new Outer Public Safety Zones of double that size (2000m long by 200m wide) are to be provided, within which development containing limited human occupancy may be permitted. Pending more detailed review, the occupancy numbers to be permitted in these Outer Public Safety Zones will be the same as applied in other larger Outer Public Safety Zones in Ireland (pending review of these provisions), i.e. <60 persons per half hectare for housing, <85 persons per half hectare for retail or leisure, <110 persons per half acre for working premises...”

- 1.6. We would note part of the existing NVD developed and operational lands are within the inner approach area. It is also relatively common place for development to take place in these areas, as set out further in this submission and in the APD report. Car/truck storage facilities have an a very low occupancy level working on site. The number of personnel working at a car/truck storage facility would be a small fraction of the 110 persons per half hectare noted in 1.6 above for working premises. The existing NVD welfare, workshop and office facilities would serve the personnel working in an expanded facility under the APP/TOC Surfaces. No new warehouse, workshop or office is required to use adjoining NVD lands for car/truck storage.

- 1.7. Policy IE8 of the Draft Development Plan states:

“Policy IE8: Casement Aerodrome

Safeguard, having regard to the requirements of the Department of Defence, the current and future operational, safety and technical requirements of Casement Aerodrome and facilitate its ongoing development for military and ancillary uses.

IE8 Objective 1: To ensure the safety of military and other air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities.

IE8 Objective 2: To maintain the airspace around Casement aerodrome free from obstacles to facilitate aircraft operations to be conducted safely, as identified in the Development Plan Index map and outlined in Chapter 13 Implementation and Monitoring.

IE8 Objective 3: To implement the principles of shielding in assessing proposed development in the vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) (See Chapter 13 Implementation and Monitoring).

IE8 Objective 4: To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (See also Chapter 13 Implementation and Monitoring).”

- 1.8. Whilst our client is supportive of the intent of this policy, to safeguard the Aerodrome and public; it is respectfully submitted that the blanket approach to restricting development is not appropriate, given that appropriate development may take place

in such areas, utilising these lands rather than other lands which may be suitable for more person intensive uses, as is set out in this submission.

2.0 DEVELOPMENT WITHIN INNER APPROACH AREAS

National Planning Framework 2040 and EMRA RSES

- 2.1. The National Planning Framework does not include specific provisions for development in the vicinity of airports; it does however emphasise that more intensive uses, should be located proximate to appropriate infrastructure, such as public transport, roads network and utilities. Section 4.4. of the NPF States:

“At an urban scale, in cities and towns generally, it is important to identify locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally. Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of:

- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises;*
- *Locations for expansion of existing enterprises;*
- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/ customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability;*
- *Locations for potential relocation of enterprises that may be better suited to alternative locations and where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns.*

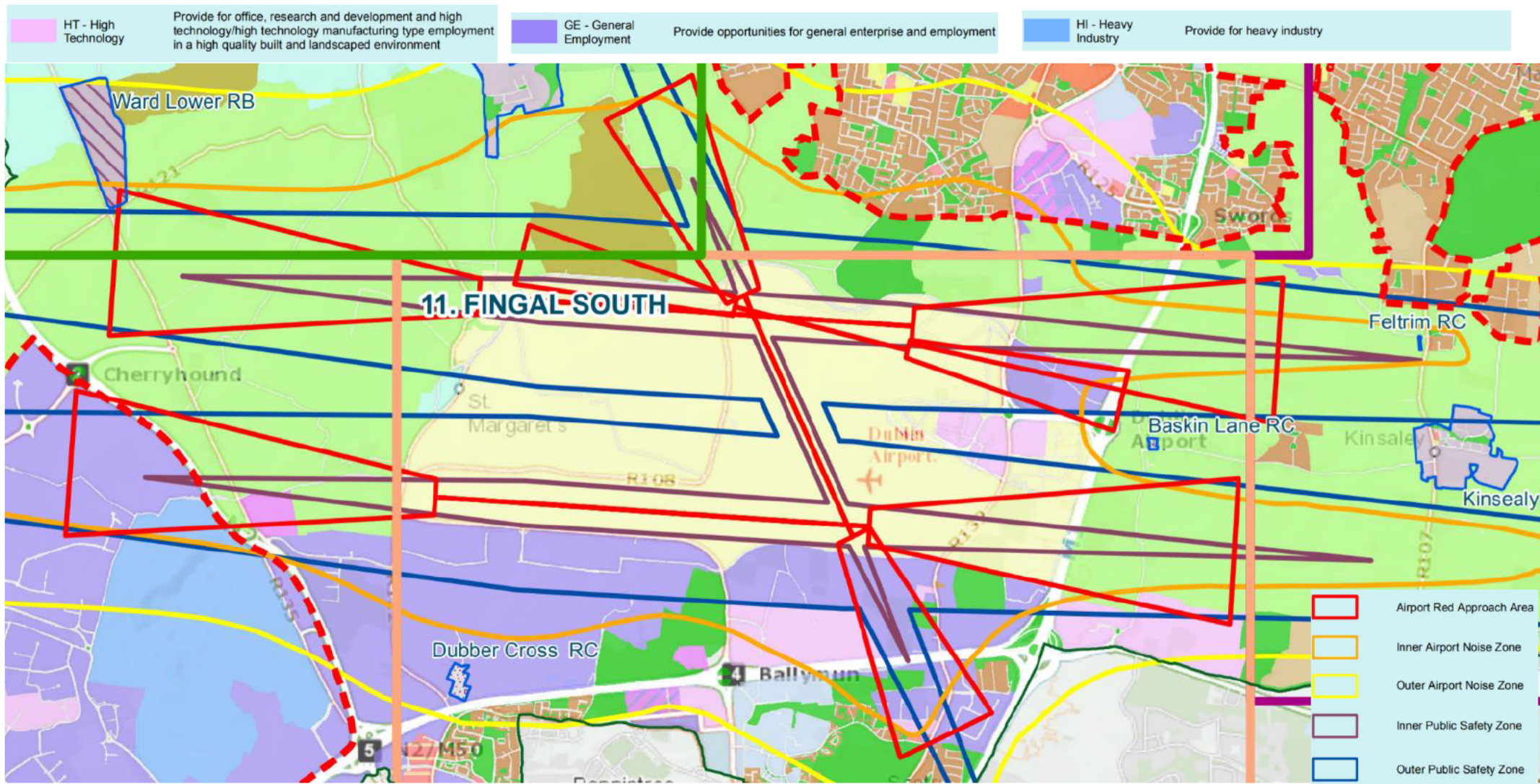
- 2.2. These recommendations follow through into the Eastern and Midlands Regional Spatial and Economic Strategy in the form of ‘Guiding Principles’ for Economy and Employment.
- 2.3. It is respectfully submitted that uses such as that of the existing NVD facility would be an appropriate use of lands in urban areas, subject to an aviation safety assessment and risk assessment. The provision of such uses in these areas would allow for a relocation of similar uses to a suitable location, or expansion of the existing facility, freeing up other land in SDCC, perhaps for more intensive uses in locations which are more accessible.
- 2.4. The need to consider appropriate types of uses in the immediate vicinity of Casement Aerodrome from an aviation safety perspective is appreciated. Generally, the type of uses envisaged in these areas would be warehouse and storage type uses, which would not be particularly sensitive to noise and vibration impacts from the operation of airfields, or be of a type of development likely to give rise to aviation safety concerns, as set out in the report prepared by Airport Planning & Development Limited included as Appendix 1.

Examples of Development in Inner Approach Areas

- 2.5. An example of development within Inner Approach Areas, aside from the subject example on NVD lands is Dublin Airport, whereby car parking is provided in the inner approach area, as shown below:



- 2.6. There is indeed a Specific Objective of the Fingal Development Plan to provide for a car park at this which is within the Inner and Outer public safety zones.
- 2.7. In addition to the above example, please see Appendix 1 and 2 of the APD Report which provides examples from international airports and another military aerodrome whereby parking and commercial development is located in these areas.
- 2.8. Lands surrounding Dublin Airport, including within Inner Approach Areas and Public Safety Zones have zoning objectives for commercial development, as shown overleaf.
- 2.9. In this respect it is respectfully requested that consideration be given to commercial development within Inner Approach Areas in SDCC. This development would be low occupancy use such as truck parking, car parking, yard uses for contractors and other businesses, materials storage and other such open storage areas,
- 2.10. Currently the agricultural use in the Inner Approach Areas offers little security surveillance and protection. The development of these lands for yard type uses would provide secure fenced areas with the provision of monitored surveillance to provide active security in the Inner Approach Area. This would offer best security practice rather than unmonitored land areas. This would benefit all local stakeholders including Casement Aerodrome.

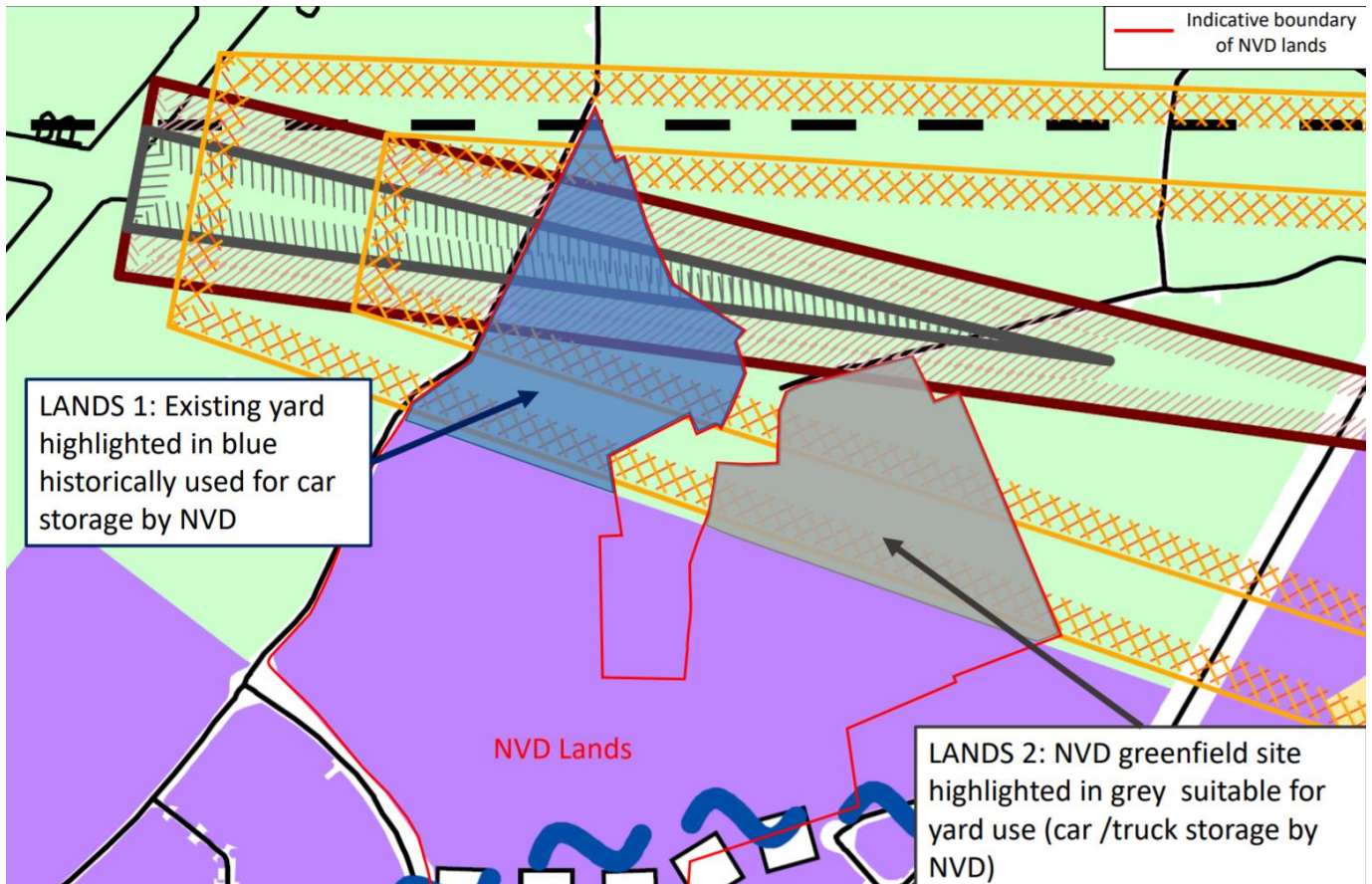


Extract – Fingal County Development Plan 2017 Zoning Map

3.0 REQUESTED MATERIAL ALTERATIONS TO THE DRAFT PLAN

Requested Changes to Zoning Objectives

- 3.1. It is respectfully requested that the existing NVD facility under Runway 28 APP/TOC surfaces is recognised with the current RU lands requested to be zoned as Zoning Objective EE (Enterprise and Employment) as identified as 'Lands 1' in the following map. These lands have been utilised for many years for car and truck storage. This is a secure area with 2.4-metre-high fencing at the perimeter, controlled access and security staff/CCTV monitoring.

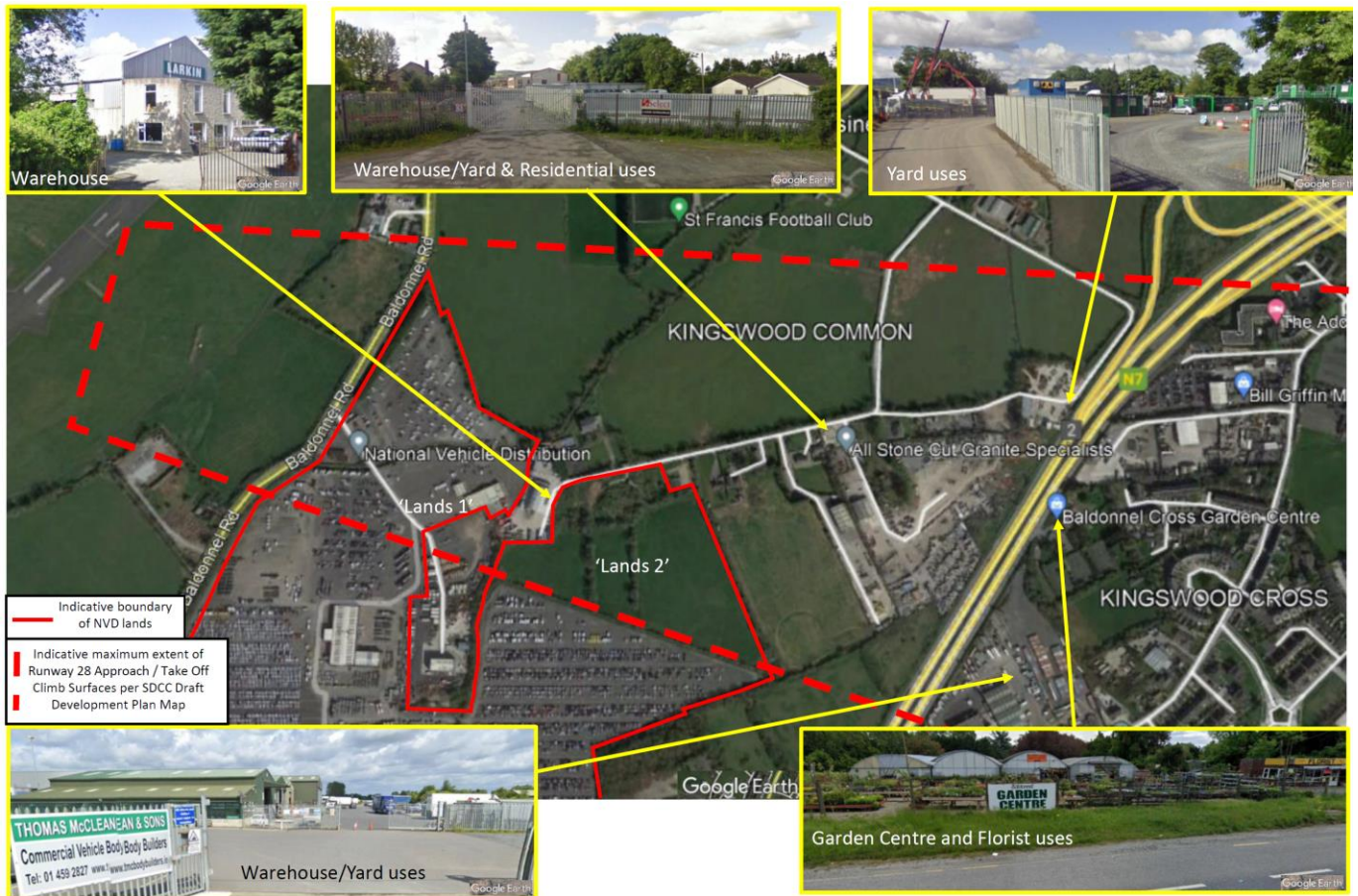


Extract Zoning Maps 4 & 8 (SDCC Draft Development Plan)

- 3.2. Additionally, for the reasons set out heretofore, it is respectfully requested that provision is made in the Development Plan for extensions to the existing NVD facilities on the remainder of the RU lands in NVD control (as identified as 'Lands 2' in the above map) requested to be changed to Zoning Objective EE (Enterprise and Employment). 'Lands 2' are further from the runway threshold, are not in the inner public safety zone and will be secured and monitored per all the NVD landholding to provide additional safety and security to the area under the APP/TOC surfaces. The use of this land for car/truck storage will not penetrate the APP/TOC surfaces.

See below satellite image and photomontage showing the location of existing NVD facility and noting the location for the NVD 'Lands 1' and 'Lands 2'. There are a number of existing uses under the AAP/TOC surfaces arising in the lands adjoining

NVD. The proposed use of NVD 'Lands 1' for car and truck storage is compatible with the existing adjoining uses.

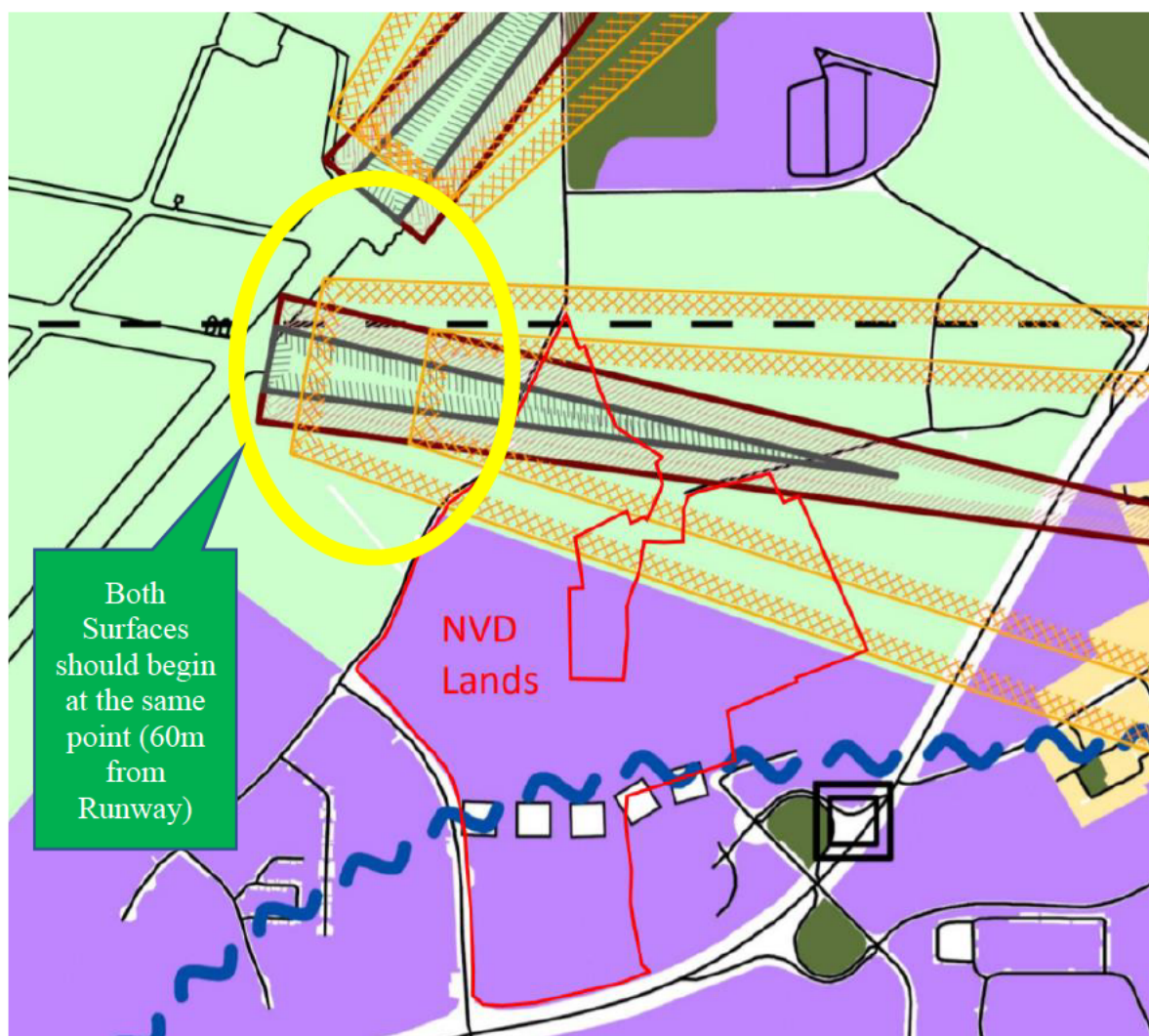


Existing Commercial Uses located under Runway 28 Approach/Take Off & Climb Surfaces

- 3.3. Development of these lands would be subject of the controls of Policy IE8 for safeguarding the operations of the Aerodrome and the public, allowing for limited, no person intensive development with an Aviation Assessment to be submitted as part of any planning application to confirm the proposed use would not impact on the operations of the Irish Air Corps at Casement Aerodrome.

Requested Material Alterations to Aviation Mapping

- 3.4. As set out in the APD Report, it is considered that the Approach Surface (APPS) and Take-Off Climb Surface (TOCS) for Runway 28/10 should be drawn from the same distance of 60 metres from the runway (illustrated below), and therefore it is respectfully requested that the Aviation Maps in the Draft Development Plan are revised in this respect.



- 3.5. This may have been a mapping error in the Draft Development Plan, and may not be considered material.

Requested Material Alterations to Policy IE8 Objective 4

- 3.6. In order to facilitate the appropriate development referenced in this submission, the following additional sentence, as set out in the accompanying APD Report, to Policy IE8 Objective 4 is requested:

To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (See also Chapter 13 Implementation and Monitoring). Where new development is proposed within a PSZ, a Risk Assessment should be submitted.

4.0 SUMMARY AND CONCLUSIONS

- 4.1. On behalf of our client, National Vehicle Distribution, we make this submission on the draft County Development Plan, to respectfully request material alterations to facilitate appropriate development within Inner Approach Areas and Public Safety Zones within the County, which is consistent with aviation safety criteria and best security practice

- 4.2. Careful consideration of appropriate uses within Inner Approach Areas and Public Safety Zones will provide for an efficient use of land, to assist in the wider goals to achieve a compact urban form. Car and truck storage will enhance the security of the air safety and security of the area through controlled and monitored use by NVD.

Yours sincerely,



John Spain Associates

Appendices

Appendix 1 APD Report - Response to the Draft South Dublin County
Development Plan 2022-2028