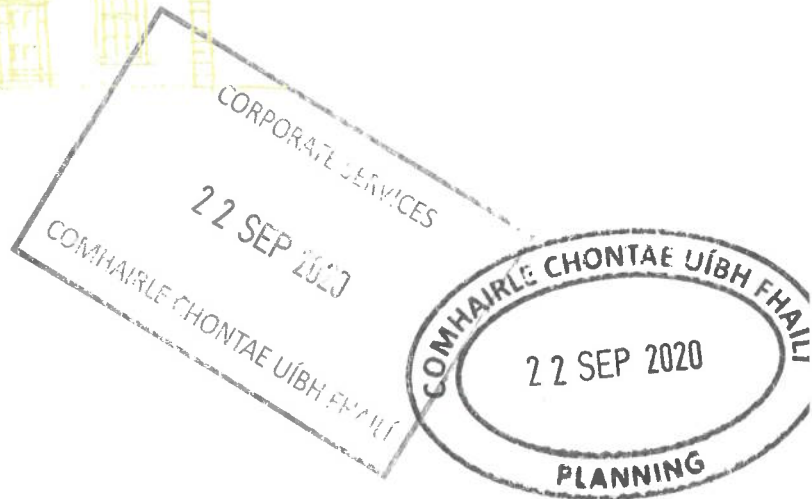




Forward Planning Section
Offaly County Council
Aras an Chontae
Charleville Road
Tullamore
Co. Offaly



Re: Offaly County Council Draft Development Plan 2021-2027 (**SUBMISSION**)

A Chara

This is a well considered plan for the future development of County Offaly which incorporates a sound plan for the town of Tullamore.

Both plans build on the foundations of national and regional policy. They are underpinned by realistic estimates and projections. Their policies and objectives are worthwhile and achievable within their lifetime. I commend the Council and its forward planning section on their professional approach .

I would ask however that the following proposed objective **not** be included in the adopted plan:

SMAP-26 *'It is the policy of the Council to support the provision of an Airport within the County or in the Midlands where it would contribute towards the proper planning and sustainable development of the county and comply with all environmental legislation and the policies and objectives contained within this plan and higher level planning documents including the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy'*.

As the Council confirmed in its letter to me of the 31st January 2020 (FOI 03/20), this proposed objective does not derive from any adopted national or regional policy or any independent study which would suggest that that an Airport within the County would contribute to its proper planning and sustainable development. It is unmentioned in any of the submissions, assessments, recommendations or considerations received by the Council during the consultation phase. Its inclusion directly conflicts with and undermines other policies of the Draft Plan.

The implications of this draft objective may be considered under the following headings:

'An Airport in the County or the Midlands'

At present, the other Midland authorities-Laois, Longford and Westmeath -are at various stages of preparing Draft Development Plans. In their issues papers or responses to submissions, none so far have adopted the objective of supporting an Airport in the Midlands. Thus it would appear that the proposed objective relates solely to Offaly. A planning search indicates that permission for an

airport in Offaly has neither been sought or granted in the recent past.

An 'Airport' is defined as '*an aerodrome with a custom-house, used as a station for international transport of passengers and cargo*'. Essential on site elements would include a paved runway, terminal building, hangars, fuel storage and parking and possibly waste disposal and water storage facilities. Off site considerations would include the need for good quality road access-ideally linkage to the motorway system, flight path restrictions and mitigating the impact of noise emissions. Proximity to Natura 2000 sites, particularly those of bird species, would be a significant locational consideration.

Airports therefore are significant land uses with impacts far beyond their actual site. If one is to be located in Offaly (and I am not aware of any objective study which has made the case that one should be), the preparation of a land use/economic survey incorporating strong environmental inputs would be a prudent first step. Instead, by the adoption of the above policy, the Council commits itself to the unequivocal support of a project whose location, nature, extent, economic consequences and off site environmental impacts are entirely unknown. This approach is directly in conflict with the principles of proper planning and sustainable development.

National and Regional Strategies.

Both 'Project 2040' and the adopted EMRA Strategy 2019-2031 nominate Dublin Airport as the sole commercial airport for the region and neither make any reference whatsoever to alternative or competing facilities -in particular to any need for an airport in Offaly. The State has committed itself to increasing investment in road and rail infrastructure in order to improve access to Dublin Airport and to capitalise on the increase in capacity which will be provided by the second runway, which is presently under construction. As the shortest timescale for the review of either of these two strategies is at least eleven years in the future, any reference to conformity with their objectives in an Offaly County Plan whose lifetime is only six years, is utterly meaningless.

I also note that the interim progress report of the National Aviation Policy for Ireland 2019 (which incidentally received no submission from Offaly County Council during its consultation period) makes no reference to the need for an airport in Offaly or the Midlands but fully supports the continued development of Dublin Airport .

'Support'

As the development of an airport in Offaly or the Midlands is unsupported by national or regional policies and presumably will not be developed by any local authority, it must therefore be a private sector project. Support by the local authority therefore could extend to:

Planning

The principal support which Offaly County Council could offer would be the zoning of as yet unidentified lands for airport uses. Planning restrictions could be applied in relation to other lands within the flight paths or noise zones in order to protect safety and residential amenity.

Financial

Support in terms of capital investment by the Council from its own funds might be considered as well as ongoing subventions towards operational or acquisition costs.

Legal



Should difficulties arise in relation to the acquisition of lands necessary to complete the development such as access or way leaves, the Council could support the project by using its power to compulsorily acquire these.

Infrastructural

Support could extend to the provision of new roads, the creation of motorway junctions and access to water supplies and waste water facilities.

The adoption of the objective therefore exposes the Council to incalculable consequences arising inter alia from the placing of planning restrictions on adjoining lands, the diversion of scarce infrastructural capacity, unknown budgetary demands and conflict with existing property rights. Its adoption therefore as a policy of the County Plan is at best premature and at worst in conflict with several other policies such as the avoidance of sprawl, the planned implementation of a road and infrastructure network, conflict with Natura 2000 sites etc.

Procedure and Transparency

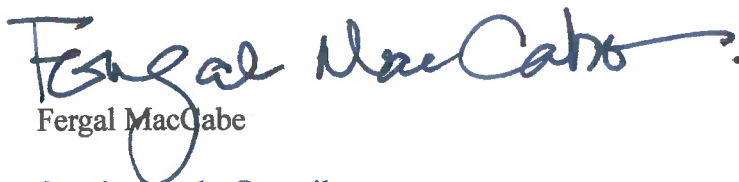
The provision of an airport at an unspecified location in Offaly or the Midlands would have been an important topic for discussion within the context of making a new Development Plan for Offaly but the Issues Paper prepared by the Executive makes no mention of such an ambitious and significant project. The only reference to an airport is in the report of the Chief Executive of the 20th November and that is bereft of any details or justification of the proposal.

Thus, those individuals and statutory bodies (particularly the Dublin Airport Authority) who might have had submissions to make in respect of such a proposal had it featured in the Issues Paper, were denied the opportunity to do so and their only opportunity now is to respond to the policy at the published Draft Plan stage. This is made more difficult for interested parties as no details of the genesis, extent, location, nature or potential funding of the proposal are known.

Conclusion

The Issues Paper prepared by the Council and the report of the Chief Executive of the 20th November are clear cut and **comprehensive**. The summary of the various submissions, their interaction with national and regional policies is professional and objective. Apart from the proposal the subject of my **submission**, the recommendations of the Chief Executive arising from these are sound and implementable. The inclusion of this significant but entirely unjustified objective has marred an otherwise professional and transparent process and if adopted will undermine public confidence in the statutory planning system.

Mise le meas



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