

S.37

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

☐

Having considered the contents of the submission dated/received 20/12/24
from Irish Exporters Association I recommend that section 131 of the Planning
and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

no w l s

Section 131 not to be invoked at this stage.

☒

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed



Date

31/12/24

EO

Signed

Date

SEO/SAO

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

Date

EO

Signed

Date

AA



Planning Appeal Online Observation

Online Reference
NPA-OBS-004132

BPA40 to issue
✓ file 31/12

Online Observation Details

Contact Name
Simon McKeever

Lodgement Date
20/12/2024 18:43:13

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Simon McKeever

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

Cathy Carleton

EO

Date

31/12/24

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG-077001-24

Reason for Refund

Documents Returned to Observer

☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes ☐ No

Signed

EO

Date

Finance Section

Payment Reference

ch_3QYBAKB1CW0EN5FC1GMq9Yxz

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

**The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V90**

17th December 2024

RE: An Bord Pleanála Appeal Reference Number: ABP-314485-22

Dear Secretary,

I am writing to express my concerns regarding the recent Draft Decision referenced above by An Bord Pleanála with regard to Dublin Airport and in particular to the restrictions placed on aircraft movements and operating times of the North Runway. We do not believe the Draft Decision is in the best interests of our members, furthermore and consequently we believe it will undermine the very prosperity of the country.

The Irish Exporters Association.

The Irish Exporters Association (IEA) is the leading independent representative body and voice for exporters based in Ireland. It is focused on International Trade and a trusted partner of its members and key stakeholders across the public and private sector. The IEA represents exporters and supply chain operators across the country and works at regional, national, and European level, representing its members to create a regulatory and legislative framework that supports, drives, and fosters Irish exports.

The IEA represents the whole spectrum of companies within the export industry including SME's who are beginning to think about exporting for the first time right through to global multinational companies who are already extensively exporting from (and importing into) Ireland; as well as the providers of key transport, logistics and professional services to the sector.

The IEA is the connecting force for Irish exporters, offering practical knowledge and support throughout Ireland and in international markets. It assists members in expanding their exports globally, driving growth and development for all exporting businesses based in Ireland. We provide a suite of highly relevant business services and products to support our members in international trade.

Introduction.

International Trade plays a crucial role in Ireland's economy, serving as a key driver of growth, employment and prosperity. As a small, open economy, Ireland relies heavily on international trade and its vital transport links, including air, to sustain and fuel its economic development and maintain competitiveness in the global market. The country's goods exports amounted to €197 billion in 2023ⁱ, with service exports equating to €339.6 billion in 2022ⁱⁱ, the year for which latest statistics are available. Already in the year to end of October 2024ⁱⁱⁱ, goods exports have exceeded €187 billion with imports for the same period €114 billion. Irish Exporters have significantly contributed to Ireland's GDP, enhanced our prosperity as a society and have in particular created and sustained numerous job opportunities.

As an Island nation, air connectivity is fundamental and of vital importance to Ireland's continued economic growth and prosperity. It is critical to supporting the State's ambitions to appreciably develop our indigenous enterprises where exporting is an essential route to scaling as well as to both maintaining and increasing levels of Foreign Direct Investment, a hugely valuable sector to our economy.

In recent years, geo-political tensions have given rise to significant challenges to the sector, such as conflicts in Ukraine and the Middle East, and rising tension in the Red Sea region. These have had knock-on effects on business environments both at home and abroad. These tensions show no signs of abating and with a new administration about to start in the USA in January 2025, we need to ensure we do nothing that would jeopardise both our exports and our attractiveness as a destination for FDI, both key to our future economic prosperity.

Risks arising from the Draft Decision.

The potential foregone economic impact arising from the operating restrictions imposed by the Draft Decision are very clearly reflected in some detail in the 2021^{iv} InterVISTAS Report – *Dublin Airport Economic Impact of Operating Restrictions* which forecasted a forgone economic impact peaking at 5,170 jobs and €392 million in Gross Value Added (broadly equivalent to Gross Domestic Product) in 2023. The majority (83%) of this forgone economic impact was expected to occur outside of the aviation sector (indirect, induced and catalytic impacts) and 25% is projected to occur in Fingal. The broader impact on tourism, trade, investment, and the wider economy is significant and cannot be overlooked.

It is important to underline the restrictions this Draft Decision, which rejects the ANCA approval of August 2022, will impose on Dublin Airport as a vital gateway for international freight and services exports. This flexibility is particularly important for airlines which require early morning departures and late evening arrivals for their short-haul operations, as well as early morning arrivals for transatlantic flights. Air Cargo by nature, is high-value low-volume and most often time-critical, and Dublin Airport is the main cargo airport for Ireland, handling 90^v per cent of the country's air freight and circa 35 per cent of all Ireland's trade by value.

From our perspective, The Draft Decision would limit Irish Exporters Association members' ability to maintain and grow their businesses, and the overall potential impact on the Irish economy cannot be ignored. Dublin Airport plays a pivotal role in supporting Ireland's export industry.

As a major gateway for international trade, the airport facilitates the swift movement of goods and executives to and from global markets, ensuring that Irish businesses remain competitive on the world stage. The efficiency and reliability of Dublin Airport are crucial for exporters who depend on timely deliveries to maintain their supply chains and meet customer demands.

In an increasingly uncertain world, it is more important than ever to have robust and flexible infrastructure to support our economy. The ability to adapt to changing global trade dynamics is essential, and this Draft Decision by An Bord Pleanála will significantly reduce Dublin Airport's capability to serve as a critical hub for international commerce. Ensuring that the airport operates efficiently will provide the stability and confidence needed for businesses to thrive amidst geopolitical uncertainties.

Of no less importance is the necessity to maintain and increase flexible connectivity to key sources of Foreign Direct Investment (FDI), particularly the USA, as we face the potential challenges a new US administration may bring. The impact of the Draft Decision is significantly unhelpful in this regard, potentially painting the country as not open for business and could well have unforeseen consequences which we feel the necessity to spell out in this submission.

In conclusion,

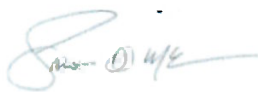
The Draft Decision by An Bord Pleanála poses a significant threat to the economic stability and growth of Ireland. The restrictions on aircraft movements and the operating conditions of the North Runway at Dublin Airport will severely curtail the airport's ability to function as a vital hub for international trade and commerce. This Draft Decision not only jeopardizes the efficiency of air freight operations, which are crucial for the timely and reliable movement of goods, but also impairs the airport's capacity to accommodate increasing passenger traffic, thus undermining the broader economic benefits that arise from robust air connectivity.

The potential loss of jobs and Gross Value Added, as highlighted in the 2021 InterVISTAS Report, underscores the gravity of the situation. The knock-on effects on sectors beyond aviation, particularly in trade, tourism, and investment, cannot be ignored. Dublin Airport's role in facilitating Exporting to world markets and Foreign Direct Investment, especially from key markets like the USA, is indispensable for maintaining Ireland's competitive edge on the global stage. The proposed restrictions risk portraying Ireland as less favourable for business, potentially deterring future investment and economic opportunities.

In light of these considerations, it is imperative that An Bord Pleanála re-evaluates its Draft Decision and approves the DAA's proposed amendments, as supported by ANCA. Ensuring that Dublin Airport operates with the necessary flexibility will provide the stability and confidence required for businesses to thrive despite geopolitical uncertainties.

Your thoughtful reconsideration of this matter will support Ireland's economic resilience and future prosperity.

Yours sincerely,



Simon McKeever
Chief Executive

ⁱ [CSO – Goods Exports and Imports 2023](#)

ⁱⁱ [CSO – International Trade in Services 2022](#)

ⁱⁱⁱ [CSO – Goods Exports and Imports 2024](#)

^{iv} [Dublin Airport Economic Impact of Operating Restrictions 2021](#)

^v [Economic Impact of Cargo Night Flying at Dublin Airport 2020](#)