

File With

SECTION 131 FORM

Appeal No

ABP— 314485-22

Defer Re O/H

☐

To

SEO

Having considered the contents of the submission dated/received observation 30/9/22
 from Ibec 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 new issues raised

Signed

EO

Date

To

EO

Section 131 not to be invoked at this stage.

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

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☐

Signed

SEO

Date

Signed

SAO

Date

M

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

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference

NPA-OBS-001318

Online Observation Details

Contact Name
Neil Walker

Lodgement Date
30/09/2022 17:08:44

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Neil Walker

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☒

Yes — P.T.O.

☐

N/A — Invalid

Signed

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

30 September 2022

Reference ABP-314485-22 (Dublin Airport North Runway)

Dear Sir/Madam,

I am writing on behalf of Ibec in respect of the appeals to the Board against the consent recently granted by Fingal County Council to daa in respect of revised planning conditions for operation of Dublin Airport North Runway (Fingal register reference F20A/0688).

Ibec is Ireland's largest business representation organization with thousands of member companies throughout the country, including in Fingal. We work with government and policymakers locally, nationally, and internationally to shape business conditions and drive economic growth.

Our members have long been concerned that the conditions attached to the original planning permission would impact adversely on overall passenger and cargo capacity once the new runway was operational. Given that these conditions were imposed more than 11 years ago, there was a clear case for reviewing them, bringing them into line with ICAO's Balanced Approach to Aircraft Noise Management, and taking due account of the substantial improvement in aircraft noise performance over the intervening period.

More recently, we formed the view that planning conditions 3(d) and 5 were incompatible with the Eastern and Midlands Regional Authority's Regional Planning Objective 8.17, in that they impose unnecessary constraints on Dublin Airport's ability to compete effectively against other EU and British hub airports, several of which have already implemented noise-management regimes based on ICAO guidance.

Ibec understands that the original planning conditions could have resulted the cumulative loss of at least 4.4 million passenger journeys over the period to 2025 as passenger volumes returned to pre-pandemic levels or higher. The early morning shoulder period (6.00am to 7.00am) is of particular importance to the two main airlines operating out of Dublin Airport, and now relies in part on dual runway availability. Given the time zone difference between Ireland and continental Europe, it could prove difficult, if not impossible, for the 'red-eye' passengers to reschedule to a flight later in the day without needing an overnight stay. The original restrictions would therefore have adversely impacted on the cost-effectiveness of routes operating out of Dublin.

Moreover, our members consider night-time arrivals into Dublin Airport to be of particular importance to the efficient movement of 'just in time' freight such as pharmaceuticals and medical technology. Ibec understands that inward and outbound night flights support international trade that is worth approximately €19 Billion per annum. Ibec therefore believes that the overall employment impact of reduced night and shoulder period flights would have been compounded by indirect adverse effects on Irish supply chains across a range of high value industry sectors other than aviation if the planning conditions had not been amended.

For these reasons, we strongly support the recent decisions of Fingal County Council, and of the Aircraft Noise Competent Authority in respect of the North Runway.

Yours sincerely

Neil Walker

Dr Neil Walker
Head of Infrastructure, Energy and Environment