

File, 18/12

S.37

File With

SECTION 131 FORM

Appeal No

ABP- 314465

Defer Re O/H

Having considered the contents of the submission dated/received

17/12/24

from itc

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 m 2884

Section 131 not to be invoked at this stage.

☒

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

Signed

[Signature]

Date

19/12/24

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



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference
NPA-OBS-004105

James
BP23
Vfd 11914

Online Observation Details

Contact Name
Eoghan O'Mara Walsh

Lodgement Date
17/12/2024 16:20:45

Case Number / Description
314485

Payment Details

Payment Method
Online Payment

Cardholder Name
Arlene Woods

Payment Amount
€50.00

refu

Processing Section

S.131 Consideration Required

☒ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

19/12/20

Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 50

Lodgement No

LDG— 076855-24

Reason for Refund

already a participant

Documents Returned to Observer

☐ Yes ☒ No

Request Emailed to Senior Executive Officer for Approval

☒ Yes ☐ No

Signed

EO

Date

19/12/24

Finance Section

Payment Reference

ch_3QX3VpB1CW0EN5FC1ZtYicpl

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 V902

December 17th 2024

**Re: Support for Dublin Airport's North Runway and Review of Draft Decision
Reg. Ref. PL06F.314485**

To whom it may concern,

The Irish Tourism Industry Confederation (ITIC) writes to express our full support for daa's North Runway Relevant Action and our concerns regarding the draft decision issued by An Bord Pleanála (ABP) on September 11, 2024, under Reg. Ref. PL06F.314485.

ITIC is the representative body for all leading Irish tourism stakeholders, the country's largest indigenous industry and biggest regional employer. Dublin Airport as the key gateway to the island is of critical importance to Irish tourism who depend on the bulk of its revenue from international visitation.

The proposed conditions outlined in the draft decision present significant operational challenges for Dublin Airport with far-reaching implications for the tourism industry and the wider economy.

Dublin Airport's connectivity with the world is vital for our economic prospects as well as the tourism industry's wellbeing, with approximately 85% of all international visitors arriving through Dublin Airport. According to the CSO the tourism sector employs 284,800 directly in almost 46,000 tourism-related enterprises, this represents 13% share of total employment across the economy.

Total employment related to tourism is estimated to increase to 352,000, when jobs in non-specific tourism businesses are taken into account. It's estimated that €5.3 billion excluding fares was spent by international visitors to the country in 2023 with North America the biggest single source market.

Fáilte Ireland and Tourism Ireland's jointly agreed target is to increase the overall economic value of overseas tourism growing revenue by an average +5.6% year on year to 2030. To achieve this growth rate and ensure the ongoing sustainability of the sector, growth in overseas visitor numbers entering & leaving Ireland via Dublin airport will be required.

In particular, ITIC wishes to highlight the following critical issues:

1. Condition 3(e)

- This condition, when coupled with existing restrictions, would severely limit the operational capacity of the North Runway during easterly winds, forcing all operations onto the South Runway during the early morning peak hours (06:00–08:00). This bottleneck could disrupt passenger and cargo flows, resulting in delays, inefficiencies, and potential reputational damage for Dublin Airport as a hub for international connectivity.

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Company Secretary: Eoghan O'Mara Walsh **Company Reg No.** 75658

2. Condition 5 – ATM Night Limit

- The proposed 13,000 annual Air Traffic Movements (ATM) cap during nighttime hours equates to an average of just 35 movements per night (23:30–07:00). This restriction disproportionately impacts the airport's capacity to handle increased demand during peak summer periods and limits flexibility during off-peak seasons.
- Errors in the calculations underpinning this limit should be addressed as they create an unnecessary constraint on Dublin Airport's ability to meet the needs of airlines, passengers, and the tourism sector.

3. Procedural and Analytical Errors

- Section 9.7 of the Aircraft Noise Regulation Act 2019 states "*measures or a combination of measures taken in accordance with the Aircraft Noise Regulation, this Act and the Act of 2000 for the airport shall not be more restrictive than is necessary in order to achieve the noise abatement objective*". It is not clear how the draft decision takes the noise abatement objective (NAO) into account. Ultimately however, if ABP is of the view that the NAO will be achieved by the existing noise mitigation measures or operating restrictions, which elements of the supporting documents appear to suggest is the case, then no additional noise mitigation measures or operating restrictions are permitted.
- However, if having considered the NAO, ABP decides that additional or modified noise mitigation measures or operating restrictions are required (such as those proposed to be imposed by conditions 3(e), 5 and 6), the Balanced Approach must be applied by ABP to identify and select possible mitigation measures. This has not occurred.
- In conclusion, the new draft conditions introduced by ABP are non-compliant with EU Regulation 598 and the 2019 Act.

Dublin Airport is an essential enabler of Ireland's tourism industry. Ensuring the effective operation and expansion of the airport is critical to maintaining Ireland's global competitiveness as a destination, meeting climate action objectives through operational efficiencies, and supporting the national economy.

ITIC urges a thorough review of the conditions and calculations within the draft decision, with the aim of addressing these concerns and ensuring that Dublin Airport can continue to serve as a cornerstone of Ireland's connectivity and growth. We remain available to engage further on this matter and to support daa in any way necessary.

Yours sincerely,



Eoghan O'Mara Walsh
CEO

ITIC Membership:

Aer Lingus, Association of Irish Professional Conference Organisers (AIPCO), Approved Tourist Guides of Ireland (ATGI), Association of Visitor Experiences and Attractions (AVEA), B&B Ireland, Car Rental Council of Ireland, CHQ/EPIC, CIE Tours International, Coach Tourism & Transport Council (CTTC), Do Dublin-Dublin Bus, Dublin Airport Authority, Dublin City Council (Tourism Unit), Dun Laoghaire-Rathdown County Council (Tourism Unit), Emirates, Fáilte Ireland (Assoc Member), Guinness Storehouse, Incoming Tour Operators Association-Ireland (ITOA), Ireland's Association for Adventure Travel (IAAT), Ireland's Blue Book, Irish Boat Rental Association (IBRA), Irish Caravan & Camping Council, Irish Ferries, Irish Heritage Trust, Irish Hotel Federation (IHF), Irish Rail, Irish Self Catering Federation (ISCF), Jameson Distillery Bow St, Kildare Village, Kerry Tourism Industry Federation, Licensed Vintners Association (LVA), Office of Public Works (OPW), Planet Payments Ireland, Restaurants Association of Ireland (RAI), Stena Line, South Dublin County Council (Tourism Unit), The Convention Centre Dublin, The Shannon Airport Group, Tourism Ireland (Assoc Member), Trinity College Dublin, TU Dublin, Vintners' Federation of Ireland (VFI), Waterways Ireland