

## **Irish Exporters Association submission to Fingal County Council Dublin Airport Local Area Plan**

The Irish Exporters Association (IEA) welcomes Fingal Council Council's invitation to submit a response to the 2 September 2019 draft Dublin Airport Local Area Plan.

### **Context:**

On 2 September, Fingal County Council published for consultation a draft Local Area Plan for Dublin Airport spanning the period 2020 – 2026. A Local Area Plan is a plan to take a detailed look at a specific area. It identifies and analyses the various issues of relevance, before establishing and setting out principles for the future development of the area, in this case Dublin Airport Local Area (LAP). Pursuant to Section 20 of the Planning and Development Act 2000 (as amended) Fingal County Council is the designated Planning Authority for the area.

As Ireland's number one transport hub, Dublin Airport has experienced significant growth over recent years, and this is expected to continue. The LAP plays a crucial role in guiding the future development and futureproofing of Dublin Airport.

### **About the Irish Exporters Association:**

The Irish Exporters Association (IEA) assists its members to grow their exports to world markets. We drive and support the growth and development of all exporting businesses based in Ireland. The IEA strategy is to support our members to grow their exports to world markets with 3 main functions:

- **Represent** the needs of members in the development of policy, lobbying, intervention at government level and in the media. Brexit and the Diversification of Export Markets, Cost Competitiveness, the War for Talent and Entrepreneurship are at the core.
- **Trade Services** include practical training, support and consultancy right across the supply chain including customs awareness and audits, export and import compliance, consular, business travel support, route to market and general assistance with trade related queries.
- **Knowledge Networks** support members to: explore new markets, route to market scenario planning, understand customs and supply chain challenges and provide thought leadership through a series of events and webinars. Networking and connectivity remain an important part of membership benefits.

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 Ireland as well as the providers of key services to the sector. It is the connecting force for Irish exporters, providing practical knowledge and support across the Island of Ireland and in foreign markets.

## **IEA Submission to Fingal County Council on the draft Dublin Airport Local Area Plan**

As an island nation, Ireland's global connectivity relies on a dense and far-reaching aviation network above all. Strategic growth opportunities lie in Ireland's strategic geographic position as a European cargo-connector between the eastern and western hemispheres. Dublin Airport has ambitious plans to develop its capacity which will also have significant impacts for air cargo operations to, through and from the island of Ireland.

We welcome Dublin Airport's Capital Investment Program to further address the airport's current capacity constraints and prepare it for substantial future growth. The airport is a significant economic driver for the Greater Dublin Region and the country at large. Large-scale capital investments such as North Runway and Dublin Airport Central (DAC) are crucial in maximising the economic benefits arising from passenger and business travel and air cargo operations.

The recent development and growth of new ex-Dublin routes to key destinations in Asia, have brought with them considerable air-cargo opportunities, in particular for fish and other agri-food products. It is crucial to continue building and expanding on this network to promote and grow Irish exports in Asian and other high-growth markets.

In 2018, Passenger numbers at Dublin Airport increased by 6.5% to 31 million, placing Dublin Airport eleventh among European airports in terms of passenger volume. The pace of passenger growth at the airport in recent years means that significant investment is now required across the campus to ensure Dublin Airport is equipped for sustained future growth. Dublin Airport has proposed a major capital expenditure programme for the 2020 – 2024 period to address capacity pinch points, and which include the development and improvement of facilities for cargo operators.

We support the implementation of this vital capital programme and welcome the commencement of development works on the North Runway as well as the advanced development stage of the new Dublin Airport Central Business Park. These developments are an important step in attracting new businesses, accessing new overseas markets and growing the domestic economy.

The Irish Exporters Association welcomes the draft LAP's acknowledgement of the critical role which Dublin Airport plays to the capital's, indeed the country's economic well-being and growth.

In this context, we highly welcome the draft LAP's commitment to safeguard Dublin Airport's future development plans through strategic land-use management. Historically, Dublin Airport has been among the few airports globally with a full land-use policy. We welcome Fingal County Council's commitment to continue this policy and put in place a number of specific policy frameworks that ensure the Airport's continued growth for the decades to come.

As noted in the draft LAP, a number of considerable bottlenecks already exist at current passenger volumes of 31 million passengers annually. Considering the current pace of global passenger growth and, specifically, at Dublin Airport, an underestimation of future annual passenger throughput numbers at this point, would significantly hamper and undermine the LPA's ability to futureproof Dublin Airport for the next decade.

In this context, and in light of the potential growth of Dublin airport traffic as a result of UK-business being transferred to Ireland following the United Kingdom's departure from the

European Union, we are concerned that Fingal County Council's projected passenger growth estimates are too conservative. We therefore call on the Council to upwards revise their estimates from 40 million by 2030 to 45 million. This would ensure a long-term futureproofing of the Dublin Airport local area, including the potential need for unexpected infrastructure developments over the period, without it reaching full capacity towards the end of the lifespan of the draft LAP in 2026.

The Irish Exporters Association welcomes that the draft LAP recognises the important supporting role of cargo facilities at Dublin Airport. However, we note with caution the draft LAP's objective CG2 under heading 7.2.6 on air cargo on, "the relocation of existing cargo operations from the eastern campus. This would facilitate maximising the ability of this campus to accommodate expanded passenger capacity and services."

According to figures from the Central Statistics Office, a total of 157,364 tonnes of air cargo was handled by Ireland's main airports in 2019, 93% of which was international shipments. With 143,708 tonnes (91%) Dublin Airport accounted for the vast majority of Ireland's air cargo movements.

Air cargo carries about 35% of all Irish merchandise exports by value and any proposed relocation of cargo services at the Airport must take account of the secure and highly time sensitive nature of such shipments. In particular, the prevalence of pharmaceutical and medical device exports, in which Ireland is a global leader, requires particular attention to providing a secure, safe and completely temperature-controlled supply chain.

In this context we advise that the stated cargo objectives within the draft LAP are made dependent on the development of a comprehensive Cargo Strategy at Dublin Airport. We encourage Fingal County Council and An Bord Pleanála, and the Department for Transport Tourism and Sport to ensure that such a comprehensive Cargo Strategy is prepared by Dublin Airport, in close consultation with all stakeholders - Cargo Handlers, Freight Forwarders and Shippers to ensure the continued attractiveness of Dublin Airport as an international cargo hub.

We welcome the Dublin Airport Authority's commitment of large-scale capital investment for the development of Runway North and Dublin Airport Central (DAC). Through its immediate proximity to the Airport, DAC provides the growing Dublin-based business community with further state-of-the-art alternatives to Dublin City Centre. In this context, DAC should be considered in a broader context than non-aviation related office development.

In this context, the draft LAP's objections to any further development plans until current surface access issues are addressed through the implementation of transport alternatives such as Metrolink or BusConnects, threatens to undermine Dublin Airport as a viable business location.

While we welcome Fingal County Council's acknowledgement of the significant constraints and shortcomings in the public transport infrastructure, we deeply regret its lack of ambition in addressing Dublin Airport's transport access challenges. The IEA highly welcomes both Metrolink and BusConnects, as well as any further future developments to connect Dublin Airport and Dublin City Centre. However, conditioning any future non-aviation related developments such as DAC to the implementation of transportation links by actors and factors outside of their control, appears highly unreasonable.

In addition, North Runway, which is expected to be operational from 2022, has the capacity to provide Dublin Airport with the significant capacity increases necessary for future growth.

However, attached to North Runway are two planning conditions which will impose an airport-wide restriction of 65 aircraft movements between the hours of 23.00 and 07.00 upon the completion of construction of the runway. We have strong objections to the implementation of these restrictive conditions due to the significant negative impact they could have on exporting businesses and Ireland's international competitiveness.

Currently, during this time period at Dublin Airport there are in excess of 100 aircraft movements including air-cargo flights. A proposed reduction to 65 movements per night would result in a loss of up to 3 million passengers and a significant reduction in capacity of approximately 14% once North Runway commences operations.

Ensuring that Dublin Airport can facilitate arrivals and departures in the early morning and the late evening will maintain Ireland's current reach and expand connectivity to new destinations. It will allow Ireland to connect to the world's fastest growing markets, driving economic growth and boosting Irish exports. It is critically important that these restrictions are addressed and amended immediately.

If you would like to discuss the contents of this submission further, please contact:

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