

Fingal County Council - Planning Department

County Hall,
Main Street,
Swords,
County Dublin

29 January 2021

Re: F20A/0668

Fingal Chamber's support for daa's Amendments to North Runway's Permission

Dear Sir/Madam,

I am writing to you on behalf of the Fingal's largest business representative organisation, Fingal Chamber, to communicate our support for daa's amendments to the North Runway's mode of operation.

Dublin Airport a critical piece of national infrastructure. Politically and economically, Brexit heightens its importance in connecting Ireland to the world, while Covid-19 demonstrates how important Dublin Airport is for integrating us into global trade networks.

The North Runway expansion gives us the capacity to reach further out into the world. It will allow our tourism trade to grow in the wake of the Covid-19 collapse in international tourism. It will also open trading opportunities in new partner countries increasing growth opportunities for Irish businesses, while creating economic resilience by diversifying markets.

North Runway was granted planning permission in 2007, subject to 31 planning conditions. Two of these conditions would severely reduce the future operational capacity of Dublin Airport at peak periods.

The current conditions (3 and 5) would limit the use of North Runway between 11pm and 7am and place an overall limit of 65 aircraft movements across the entire airport during those hours. However, last year even before the addition of North Runway, there was an average of about 100 aircraft movements during this time period. If unchanged, these two conditions would significantly affect the operation of the airport and its key airline customers and would damage the entire Irish economy.

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Under the planning application lodged, daa is proposing the introduction of a noise quota system at night, which is the industry standard approach for managing night-time noise at large airports. This proposed new quota system would operate between 11.30pm and 6am.

daa is also proposing that North Runway would only be used between 6am and midnight, meaning that there would be no flights on the new runway during the core midnight to 6am night-time hours.

A restriction on the number of movements is an inflexible, rigid approach to managing night-time noise at airports. This type of cap merely limits the number of flights, regardless of how noisy or quiet a particular aircraft is. Such a restriction does not guarantee a reduction of noise, or even a prudent management of noise, whereas daa's proposal does do that.

A noise quota system, which already applies at airports such as Heathrow, Brussels and Madrid, would limit the overall amount of noise generated by aircraft and, in tandem with the other proposed measures, would limit the effects of night-time operations at Dublin Airport.

Under this system, the number of aircraft operating within the night-time window may vary, but the overall effects of noise from those aircraft would be capped. This incentivises airlines to use quieter aircraft at Dublin Airport.

Ensuring operational flexibility at the airport is crucial. If the two conditions are not addressed, it will have far reaching consequences.

Please note the following business community concerns:

1. Reduces capacity of the morning slots:

The restrictions on late arrivals and early departures that these conditions will result in increases the costs for the client airlines that wish to use Dublin Airport as their planes will need to spend less time in the air and more time on the ground.

If the planes are to be in position for 7am flights they will need to have arrived back to Ireland at least 8 hours before. This will mean a reduction in the number of flights connections along many routes.

2. Early morning Connections to Britain and the EU:

Early morning flights are already the most popular slots of the day in Dublin Airport.

These conditions will see a reduction in the capacity of the airport in the critical 6am – 8am period which will increase costs for customers.

If people are to be able to begin the working day upon arrival they need to be able to arrive at their destination early.

Being able to have a flexible operation in the peak 6am-7am window is essential for the economy given that Ireland is one hour behind continental Europe.

3. Shortens the effective operating hours of the airport:

These conditions reduce the potential for same day returns. Businesses will not be able to bring someone back to Ireland in the same day that they travelled over. This will reduce the number of business travellers considerably, while increasing costs (due to overnight accommodation etc.) for those that do. With the increase in video conferencing caused by Covid-19 the business travel market is likely to be more reduced into the medium term, creating extra hurdles to make it less attractive would damage the airport further.

4. The importance of air connectivity and Dublin Airport to Fingal businesses:

[Research estimates](#) that the North Runway, which is being funded entirely by the daa, will facilitate the creation of 31,200 jobs and will add €2.2billion to Ireland's GDP by 2043. Most of this economic contribution is expected to occur outside of the direct aviation sector in areas such as tourism, trade and investment – and this non-aviation impact will be incredibly important to the Fingal region.

5. North Runway can play a significant role in re-building the economy post-Covid:

Dublin Airport is Ireland's main international gateway and has a major impact on the Irish economy as the connectivity it provides underpins Irish trade, tourism, and foreign direct investment.

As an island with a small open economy dependent on international trade, we rely on Dublin Airport as Ireland's main gateway. According to a [2019 Economic Impact Study](#), Dublin Airport supports and facilitates almost 130,000 jobs in the Republic of Ireland and generates €9.8 billion in Gross Value Added (GVA) to the economy annually.

Fingal Chamber provides an international trade documentation service and we, along with our clients, are hopeful that the North Runway will enable airlines to expand existing services, add new routes and grow connections to Ireland's global markets in Asia, Africa and the Americas.

6. The impacts that could result if these restrictions were implemented:

If the conditions were applied, Dublin Airport would have fewer flights between 11pm and 7am with two runways than it currently has with one. This scenario would disrupt time-critical air cargo operations, long-haul connectivity and ultimately result in reduced availability of destinations and customer choice.

The operating restrictions incorporated in the grant of permission for the North Runway are forecast to result in a [forgone economic impact](#) totalling 3,430 jobs and €262 million in Gross Value Added (broadly equivalent to Gross Domestic Product) by 2025. The majority (83%) of this forgone economic impact is expected to occur outside of the aviation sector (indirect, induced and catalytic impacts) and 26% is projected to occur in Fingal.

If this issue is not addressed, the challenges that we face in re-building our economy post-Covid and dealing with the impact of Brexit will be exacerbated.

Before the crisis, Dublin Airport had flights to more than 190 destinations in 42 countries operated by almost 50 airlines, making it the tenth-largest airport in the European Union. While Covid-19 has resulted in an unprecedented drop in passenger numbers, we cannot be complacent about planning for future growth when consumer confidence returns.

7. The proposed amendments represent a fair balance that facilitates economic growth whilst also protecting local communities:

Having engaged with the local community and listened to their views the daa are now proposing very significant mitigation measures. Under daa's new proposals the overall effects of night-time noise at Dublin Airport are less than envisaged under the planning permission granted in 2007, and do not exceed those in 2018.

Within the planning application, daa is also proposing a new €7 million insulation scheme for dwellings that are most affected by night-time noise. The proposed scheme would see grants of €20,000 paid to the owners of up to 350 eligible houses.

daa has already established an insulation programme for about 200 local households and has established a voluntary scheme to purchase up to 38 properties that will be most affected by the operation of the North Runway at a significant premium to their market value if the runway was not being built.

Regarding the environment, Dublin Airport has a comprehensive sustainability programme and is carbon neutral from December 2020. It will have reduced its overall emissions by 33% compared to 2009 levels and is committed to becoming net zero for its carbon emissions by 2050 at the latest.



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It is because of these comprehensive plans, thorough actions, and vital outcomes, that Fingal Chamber supports the daa's proposals as they deliver a balanced approach that serves the needs of a developing international airport and economy, whilst safeguarding local communities with appropriate mitigation measures and monitoring.

Yours faithfully,

Anthony Cooney

Chief Executive

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