



Enhanced global connectivity for a region that works

Submission to the Aircraft Noise Competent Authority's Aircraft Noise Consultation

Ibec Dublin & Eastern
Regional Executive Committee

February 2022



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Introduction

Introduction

The Ibec Dublin & Eastern Regional Executive Committee (REC) welcome the opportunity to contribute to the aircraft noise consultation by the Aircraft Noise Competent Authority (ANCA). Airport activity is a key economic contributor in the Dublin and Eastern region, and strengthening international connectivity is important for regional growth and development. The Dublin & Eastern REC welcome the review of the original planning conditions attached to the North Runway Planning Permission, while highlighting other important considerations for review by the ANCA in relation to night-time flight restrictions.

The Dublin & Eastern Regional Executive Committee

Ibec is a national organisation with a strong regional structure. The Dublin & Eastern REC is made up of nominees from Ibec member companies operating within Dublin, Kildare, Louth, Meath, and Wicklow. It includes both multinational and indigenous companies and reflects the diversity of business in terms of sectors and company size. The committee works to shape, guide and influence business policy priorities for the region that contribute to sustainable economic growth and employment.

The Dublin and Eastern REC is committed to shaping policy that supports quality of life and a resilient and sustainable recovery across our region following the onset of the global pandemic.

The REC strategy for 2022 is shaped by three priority strands: The Enterprising Region, Planning for Growth and A Region that Works.

This submission incorporates feedback from members of the Dublin & Eastern REC on the proposed changes to the night-time flying restrictions, highlighting key economic considerations and development priorities.

Key recommendations

- > Revision of the original planning conditions attached to the North Runway Planning Permission is needed. This will support the effective and manageable growth of Dublin Airport, benefiting the wider regional economy.
- > Replace the numerical cap on night-time flights with a noise quota applicable to a shorter timeframe. This is necessary to accommodate increased passenger and freight volumes.
- > Consider air freight and the knock-on economic impact of introducing night-time flight restrictions on cargo flights.



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Discussion

1. Dublin Airport as a global gateway

As a trade-intensive island at the edge of Europe, Ireland is heavily reliant on international connectivity provided by Dublin Airport. As recognised in the Eastern and Midlands Regional Spatial and Economic Strategy, Dublin Airport is a key economic asset. It plays an essential role in our economic prosperity, supporting tourism and facilitating international trade and the supply of goods. The North Runway is a key strategic infrastructure project under the National Development Plan, increasing airport capacity and supporting operational growth.

Dublin Airport acts as an international global gateway for the entire country. At the beginning of 2020, Dublin Airport supported 129,700 jobs and it contributes €9.8 billion in Gross Value Added to the economy. While Fingal is the largest beneficiary of direct jobs, the airport also sustains direct and indirect employment across the wider Dublin metropolitan area.

The airport is a primary contributor to Ireland having one of the highest connectivity levels on the continent relative to the size of its population and economy. Dublin Airport's 59% increase in connectivity in the five years prior to 2019 made it the second-fastest growing major airport in Europe in terms of connectivity. Connectivity is critical to the economic development of the region and Ireland, supporting tourism, trade, and FDI.

Dublin Airport is key to upholding Ireland's tourism industry which earned over €9.3 billion in 2019 and supporting the wider experience economy. Ireland's experience economy encompasses travel and tourism as well as hospitality, retail, food, drink, entertainment, technology, events, and organisations in the arts, cultural, sporting and heritage sectors.

Brexit and the Covid-19 pandemic present challenges to Ireland's aviation industry. Prior to the onset of the Covid-19 pandemic, Dublin Airport welcomed a record number of passengers at 32.9 million in 2019. In the same year, six of the top ten routes for Dublin Airport were in the United Kingdom. As an open island economy, the success of our economic recovery will be shaped by our capacity to engage with, and across, international markets. Strong international connectivity and route expansion via Dublin Airport can aid Ireland's economic recovery and resilience post Brexit and Covid-19.

Re-evaluating the conditions attached to the North Runway Planning Permission in relation to night-time flights is necessary to ensure that the additional runway capacity is effectively utilised to support the recovery and growth of airport activity. The replacement of the numerical cap on night-time flights with a noise quota applicable to a shorter timeframe is necessary to accommodate increased passenger and freight volumes.

Supporting passenger mobility throughout the day and night is important for wider economic activity beyond tourism. The availability of early morning flights facilitates the movement of professionals to and from Ireland. Reducing the timeframe associated with the planning conditions to allow flights to operate until 11.30pm and after 5.59am provides increased scope for one-day trips to major European cities.

Brexit has resulted in the re-location of the European Banking Authority and the European Medicines Agency away from London. These are key regulatory bodies for key sectors of the Irish economy. Excellent and convenient connectivity to these agencies now located in Paris and Amsterdam will be essential, driving further demand for same-day business travel and early morning flights to account for the time difference. Likewise, Ireland is

becoming the European hub for regulating the digital economy, as well as growing its footprint in global corporate activities being conducted from the country.

To underpin the future economic success of Dublin Airport and to sustain strong international connectivity, the potential growth in activity at Dublin Airport cannot be impeded by overly restrictive flight controls. It is critical that the airport facilitates the optimal operational requirements of carriers and consumers, in order to encourage widespread economic activity.

Remaining competitive as an international mobility hub is also critical for the local economy and requires the optimal use of Dublin Airport's infrastructural assets. The proposed amendments to the planning conditions to reduce the curfew on night-time flying and replacing the numerical flight cap are needed to support Dublin Airport activity, supporting regional development and the wider economy.

2. Keeping Ireland connected to global supply chains

The airport plays a central role in the transportation of freight into and out of Ireland, supporting supply chain management and fulfilment, and the delivery of consumer goods. Amending the original planning conditions associated with the North runway is timely and necessary, however, further considerations are needed for the logistical implications of restricting cargo flights during night-time hours.

Air cargo and express freight supports the operations of many Irish businesses and international trade. Restricting the import and export of goods via the airport during the night is economically suboptimal as it limits the window for the night-time movement of goods. As cargo flights are key to upholding supply chains within Ireland, increased flexibility and consideration is needed to curtail negative knock-on effects on the wider economy.

Night-time flight operations are a necessity and a logistical requirement for supply chain management and the delivery of consumer goods. Air transportation supports a wide range of Irish industries, including pharmaceutical, technology and retail, requiring logistical companies to operate during night-time hours to ensure early morning deliveries and late afternoon collections for businesses and consumers. It is critical that the specific economic value of night-time flying for the Irish economy is prioritised for consideration by the ANCA.

Recent research supported by the freight transport industry highlights the necessity of cargo flights during night-time hours for the Irish economy. Approximately €19 billion worth of imports and exports are carried on night flights each year and the night-time flying of cargo supports 15,000 jobs. Night flying also supports the operation of many of Ireland's fastest growing sectors including pharmaceuticals. It is also important that the efforts of logistics companies in reducing flight noise and emissions are recognised and their impact considered.

Supporting the cost-effective, efficient, and express movement of goods is particularly important in the context of Brexit and Covid-19 to ensure that Ireland remains internationally competitive and to improve connectivity to mainland Europe and elsewhere. The recent global supply issues further highlight the need to support the unrestricted

movement of goods via air. Restricting night-time cargo flights contradicts the time-critical nature of freight transportation.

The knock-on economic implications of restricting the night-time movement of cargo flights requires specific consideration as logistics companies operate overnight to service embedded global supply chains and consumer demand. International connectivity is critical to remaining globally competitive as an island economy and to avoid supply chain disruption.

Conclusion

Dublin Airport is a key economic asset to the Dublin and Eastern region and flight operations via the airport are essential in supporting the entire Irish economy. The proposed amendments to the original planning conditions attached to the North runway development are needed to reflect and meet the growth in airport activity and the economy since 2007.

As well as the direct connectivity that Dublin Airport offers to and from Ireland, it is also a major connecting hub. The development of the North runway enhances Dublin Airport's hub infrastructure, and the development of the Dublin Hub will benefit the local region and all economic stakeholders in Ireland. Reducing the flight curfew period to between 11.30pm and after 5.59am and replacing the numerical cap on flights with a noise quota is needed to allow Dublin Airport to operate effectively in its role as a key contributor to regional prosperity and the wider Irish economy.

The impact of night-time restrictions on air freight movement requires specific consideration. Overnight cargo flights are central to the operations of logistic companies that uphold supply chains, servicing Irish businesses and consumers. Increasing the airport's capacity with the development of the North runway while introducing night-time restrictions is counterproductive, directly impacting delivery timeframes with knock-on economic effects. It is also important to consider the International Civil Aviation Organisation's Balanced Approach, their noise and emission reduction regulations and the impact of compliance by logistics companies on noise mitigation. Night-time flying is a necessity for logistics companies and their value to the economy must be accounted for.

Dublin Airport is an asset of strategic national infrastructure, underpinning regional development and supporting the Irish economy. It is critical that the original conditions associated with the North Runway Planning Permission are amended to support improved international connectivity, airport activity growth and the wider economy.



About Ibec

Ibec is Ireland's largest lobby group and business representative. We campaign for real changes to the policies that matter most to business. Policy is shaped by our diverse membership, who are home grown, multinational, big and small and employ 70% of the private sector workforce in Ireland. With 36 trade associations covering a range of industry sectors, 6 offices around Ireland as well as an office in Brussels. With over 240 employees, Ibec communicates the Irish business voice to key stakeholders at home and abroad. Ibec also provides a wide range of professional services and management training to members on all aspects of human resource management, occupational health and safety, employee relations and employment law.

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