



Submission to the Aircraft Noise Competent Authority on the Draft Regulatory Decision on Noise Abatement at Dublin Airport

February 2022

Dublin Chamber is the representative body for businesses in the Greater Dublin Area, with a multi-sectoral membership spanning the spectrum from sole traders and start-ups to major multinationals. Dublin Chamber is committed to improving the city region's business environment and quality of life in tandem, and supports a vision of Dublin with world-class public infrastructure and competitive service offerings at its core. We are therefore a strong advocate for developing critical transport infrastructure within the Greater Dublin Area and ensuring that Dublin, and indeed Ireland, maintains its international connectivity and reputation as a competitive city at the heart of Europe and the global economy.

Based on wide-ranging business feedback about the importance of international travel and connectivity, Dublin Chamber has consistently supported the expansion of Dublin Airport and a flexible and pragmatic approach to aviation services in the context of the planned North Runway. Our most recent previous submission in relation to Dublin Airport's application for permission to amend the planned operating conditions attached to the operation of the North Runway is available for reference on the Chamber website.¹ Dublin Chamber is now pleased to make this submission to the Aircraft Noise Competent Authority (ANCA) regarding its Draft Regulatory Decision in respect of Dublin Airport's planning application (Planning Register Reference No. F20A/0668). Dublin Chamber takes this opportunity to stress the importance of Ireland's international connectivity and the role it will play in regional and national recovery from the economic impact of Covid-19; these are both important contextual factors which must inform the decision-making process.

International Connectivity

International connectivity is crucial for Ireland's overall competitiveness as an island economy. Brexit continues to pose both challenges and opportunities for Ireland, and in order to address those challenges and recover post-Covid Ireland needs to diversify its markets, restore connectivity, and establish new trade routes. If Ireland fails to maintain its international connectivity, it risks damaging its attractiveness as a hub for FDI or to potential employees who are considering relocation.

The significance of Dublin Airport as a key national economic asset has grown considerably over the past 16 years. CSO figures indicate that Dublin Airport's market share of

¹ Dublin Chamber, *Submission to Fingal County Council on the Dublin Airport Planning Application*, October 2021, <https://www.dublinchamber.ie/Portals/0/Submissions/Submission%20on%20Dublin%20Airport%20Planning%20Application.pdf?ver=2021-11-04-113124-387×tamp=1636025494468>

passengers increased from 73% in 2005 to 85% in 2019.² In 2017 Dublin Airport was the 11th largest airport in the EU and the fastest growing of Europe's 20 largest airports.³ Dublin Chamber has long argued that Ireland should position itself as a significant aviation hub and establish direct connections to new markets in the Asia-Pacific region. With this in mind, we support the continued development of Dublin Airport which in normal circumstances welcomes over 80% of visitors to Ireland and will remain the main reception point for tourist and business travellers in the post-pandemic future. Dublin Airport needs to facilitate faster transit times and enhanced routes to maintain competitiveness. Ongoing investment in these areas is crucial to improving Ireland's overall resilience in the face of domestic and international shocks to the economy.

Role of the North Runway in Economic Recovery

The aviation sector is a major contributor to Ireland's economy. As an island economy, international connectivity will be vital for economic growth and success during the post-Covid recovery period, particularly in hard-hit sectors such as tourism and hospitality, and among Irish SMEs with ambitions for international growth. As the world recovers from the pandemic and travel restrictions continue to be eased, consumer confidence in international travel will grow and so too will demand. However, the pace of recovery remains unclear and, as a highly globalised economy, Ireland remains vulnerable to volatility. The economic recovery will depend on the Irish economy fully re-opening for business, and aviation will play an important role in this regard. Undue restrictions on the use of the airport will have a knock-on effect in the sectors that the airport supports, including international business, trade, and tourism. Dublin Airport must therefore continue to position itself as a competitive option for airlines.

Before the pandemic Dublin Airport was going through a key period of growth and expansion which involved developing and enhancing its capacity to cater for growing passenger numbers and new flight routes. One of the key National Strategic Outcomes identified in the National Planning Framework is high-quality international connectivity, and the NPF identified Dublin Airport as a strategic investment priority to achieve this.⁴ The new North Runway is expected to deliver a 31% increase in connectivity by 2034. This enhanced connectivity and capacity is necessary to ensure Dublin Airport's position as a leading European airport, a gateway to North America, and a key driver of Ireland's economic recovery and growth.

Draft Regulatory Decision

Dublin Chamber offers the following observations in relation to the Draft Regulatory Decision.

First, Dublin Chamber strongly welcomes the replacement of the two most onerous operating restrictions attached to the operation of the North Runway under previous proposals. It is estimated that the negative economic impact of the previously proposed

² CSO statistical release 6 June 2019: Aviation Statistics Q1 2019, <https://www.cso.ie/en/releasesandpublications/er/as/aviationstatisticsquarter12019/>

³ Dublin Airport, *Strategic Issues Paper*, <https://www.gov.ie/en/consultation/16151807-dublin-airport-strategic-issues-paper/>

⁴ *Project Ireland 2040: The National Planning Framework*, <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

operating restrictions would reach 3,430 jobs and €261 million in GVA forgone by 2025.⁵ Alongside this startling economic impact there would be knock on effects to our international connectivity: business travel would be restricted; reduced long-haul connectivity would constrain tourism; and the airport's connectivity to the wider world would be reduced. Further impacts could include increased air fares, airlines re-considering Dublin as their international base, and potential impact on air-cargo, which is more important than ever post Brexit. As the capacity of the airport is increased by completion of the North Runway, it would be counter-productive to implement restrictions that will inhibit growth and reduce our international connectivity.

The replacement of a rigid cap of 65 night-time movements with a Noise Quota System for operations between 11pm and 7am, along with some additional noise-related restrictions on specific types of aircraft permitted to operate at night, represents a more flexible and pragmatic approach to the challenge of noise management at the airport. The proposed numerical cap on movements, which was previously due to come into place upon completion of the North Runway, was extremely restrictive for the airport and did not reflect the current usage of the runways under normal conditions, which during key busy periods reaches up to 115 movements per night. Likewise, the allowance for use of the North Runway during the night-time 'shoulder hours' of 11pm-12am and 6am-7am is also very welcome.

Second, Dublin Chamber notes that ANCA has opted for the noise quota system to remain in place for an 8-hour period, as opposed to a night-time period of 6 hours and 30 minutes as proposed by Dublin Airport. This is a longer restriction period than applies in some other European airports and will result in limitations on operation capacity at what is effectively Ireland's national airport. We also note and welcome plans for the Residential Sound Insulation Grant Scheme of up to €20,000 for local residents.

On balance, Dublin Chamber welcomes the Draft Regulatory Decision and is satisfied that ANCA has balanced the requirement for adequate operational flexibility at Dublin Airport, which is essential for national economic recovery and future international connectivity, with the need to give due consideration to local community concerns about the inevitable noise impact associated with such vital infrastructure. On behalf of the business community, we express our support for the key elements of the Draft Regulatory Decision and ask that the planning process be brought to a speedy conclusion so that Dublin Airport can maximise its contribution to regional and national economic recovery.

⁵ Dublin Airport, *Economic Impact of Operating Restrictions*, Update Report October 2020, https://www.dublinairport.com/docs/default-source/north-runway---public-information/9-economic-impact-of-operating-restrictions-report.pdf?sfvrsn=9f143ee4_4