



Chambers Ireland submission to Aircraft Noise Competent Authority on draft decision relating to Dublin Airport's North Runway

February 2022

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

In September 2019, our Network pledged to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), advancements in gender equality (SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).¹

We use these Goals as a lens for interpreting and prioritising our policy proposals. "International Connectivity" is a key concern of our members. Ensuring that businesses in Ireland can connect with the customers and collaborators abroad is essential if we are to maintain a culture of Decent Work and Economic Growth.

Of particular importance is connectivity to continental Europe, and this is what has led us to be so interested in the limitations that have been put on Dublin Airport arising from the North Runway planning decision. Unless it is practical for businesspeople to leave Ireland and return home within the same working day, the costs of doing business internationally rise considerably.

¹ The Chambers Ireland SDGs. Available at: https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/

In February 2021, Chambers Ireland made a detailed submission to Fingal County Council relating to Dublin Airport's North Runway and specifically, the two conditions attached to its planning. Within this submission, we highlighted the importance of amending these conditions in order to:

- 1) Maintain and develop Ireland's air connectivity essential for both expanding the Irish export trade and growing foreign direct investment in Ireland.
- 2) **Protect competitiveness** early morning and late evening arrivals and departures are essential for many Irish businesses, particularly given Ireland's time difference with continental Europe.
- 3) **Re-build our economy post-Covid** North Runway will play a crucial role in helping to restore economic performance post-pandemic through the development of connectivity and the creation of associated jobs.

We have reviewed the recent proposals by the Aircraft Noise Competent Authority in relation to this issue and we believe that their implementation will allow Dublin Airport to fulfil the above objectives on behalf of the Irish economy.

In particular, the proposal to replace the night-time aircraft movement cap with a more appropriate noise quota system represents a fair balance. The noise quota system meets commercial and economic requirements while also providing the appropriate recognition of the needs of communities in the local area.

However, Chambers Ireland is calling for a shorter period during which the noise quota period is applied. An eight-hour period is significantly longer than what is implemented at other peer European airports, where the quota system is typically in place for 6.5 hours.

Our support of Dublin Airport's North Runway project and the replacement of the two problematic conditions is unwavering. Chambers Ireland believes that Ireland's future prosperity will be negatively affected unless these proposals are implemented.

We would ask that you consider the position of Chambers Ireland in your deliberations.