



Submission to Fingal County Council on the Dublin Airport Planning Application

February 2021

Dublin Chamber is the representative body for businesses in the Greater Dublin Area, with a cross-sectoral membership spanning the spectrum from small start-ups to major multinationals. The Chamber is committed to improving the city region's business environment and quality of life in tandem, and strongly supports a vision of Dublin with sustainability, urban density, and liveability 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 wider World.

Dublin Chamber welcomes the opportunity to respond to the application submitted by the Dublin Airport Authority to Fingal County Council in respect of extending the hours of operation and changes to night time operations. This application comes at a critical time for the airport, and the city region. The Covid-19 crisis has had a significant impact on international travel and on the operations of the airport. Ireland's enviable level of international connectivity could soon come under threat, as following this period of instability many airlines may review what airports they fly from and choose more competitive airports with fewer restrictions. Dublin Chamber recognises the need to balance the operating requirements of the airport and Ireland's interest in international connectivity with the needs and impact on the community. We welcome the proposals put forward by the airport in the planning application as striking a balance between those needs while ensuring that the airport maintains its competitive edge.

Ireland's International Connectivity

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 passengers increased from 73% in 2005 to 85% in 2019.¹ In 2017 Dublin Airport was the 11th largest airport in the EU and the fastest growing of Europe's 20 largest airports.² International connectivity is crucial for Ireland's overall competitiveness as an island economy. Brexit poses both challenges and opportunities for Ireland, and in order to address those challenges and recover post-Covid Ireland needs to diversify its markets 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 considering relocating. Dublin Chamber has long argued that Ireland should position itself as a major aviation hub and

¹ CSO statistical release 6 June 2019: Aviation Statistics Q1 2019, <https://www.cso.ie/en/releasesandpublications/er/as/aviationstatisticsquarter12019/>

² <https://www.gov.ie/en/consultation/16151807-dublin-airport-strategic-issues-paper/>

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 tourists and business travellers in the post-pandemic future. Dublin airport needs to facilitate faster transit times and enhanced routes to maintain competitive. Investment in these areas is crucial to improving Ireland's overall resilience.

Recovery Post-Pandemic

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 hospitality, tourism, and trade. As the world recovers from the pandemic travel restrictions will be eased and consumer confidence in international travel will grow, and so too will demand. However, the pace of this future recovery remains currently unclear. The economic recovery will depend on the Irish economy fully re-opening for business, and aviation will play an important role in this regard. Dublin Airport must position itself as a competitive option for airlines and any restrictions on the airport will lead to a knock on effect being felt in the sectors that the airport supports, including international business, trade and tourism.

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.³ The new North Runway is expected to deliver a 31% increase in connectivity by 2034. This enhanced connectivity and capacity will ensure Dublin Airport's position as a leading European airport, a gateway to North America, and a key driver of Ireland's sustainable economic recovery and growth. However, an economic analysis puts the forgone economic impact resulting from the operating restrictions is projected to reach 3,430 jobs and €261 million in GVA by 2025.⁴ Alongside this startling economic impact there will be knock on effects to our connectivity: business travel will be restricted, reduced long-haul connectivity will impact on tourism, and the airport's connectivity to the wider world will be reduced. Further impacts could include increased air fares, airlines re-considering Dublin as their international base, and potential significant 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.

Addressing the Specific Proposals

Airports need to be able to adapt to the changing needs of the industry. This is why due consideration must be given to the changes being proposed by Dublin Airport. Dublin Airport is proposing changes to restrictions on the night-time use of the runway system that will come into effect on completion of the North Runway. Dublin Airport proposes to remove the numerical cap on the number of flights permitted between the hours of 11:00pm and 7:00am daily and replace it with an annual night-time noise quota between the hours of 11:30pm and

³ Project Ireland 2040: The National Planning Framework, <https://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

⁴ 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

6:00am, and also to allow flights to take off and land on the North Runway for an additional 2 hours; 11:00pm to 12:00am and 6:00am to 7:00am. Dublin Chamber is supportive of both of these measures as outlined below:

- Changes to the airport operating hours, in particular to the early morning shoulder period of 6:00am to 7:00am and the late-night shoulder period of 11:00pm to 12:00am, are vital to support the airlines that operate out of Dublin Airport. Two of Europe's main airlines operate out of Dublin Airport and play a vital role in ensuring and increasing Ireland's international connectivity. These 'shoulder hours' are vital in ensuring that the airlines based in Dublin are able to connect into Europe for early morning flights. Limitations on the operating hours of the airport throw its competitiveness into doubt, and post-Covid, as airlines reconsider their routes, Dublin might not be a viable or cost-effective option.
- Dublin Airport is proposing to remove the numerical cap of 65 movements per night on the use of the runway system and replace the system with an annual night-time noise quota. The proposed numerical cap on movements, due to come into place on completion of the North Runway, is extremely restrictive for the airport and does not reflect the current usage of the runways under normal conditions, which during key busy periods reaches up to 115 movements per night. The restrictions will inhibit growth and damage the airport's competitive reputation. Dublin Chamber supports the airport's proposal for an alternative annual night-time noise quota. Such a system will balance the need for economic growth with community impact, while also taking into account the need to develop a resilient and sustainable airport that tracks its environmental impact. The noise quota system will encourage modal change amongst airlines as they move towards quieter and more environmentally efficient aircraft. This move reflects the airport's significant steps to ensure the sustainability of the airport.⁵

⁵ <https://www.dublinairport.com/corporate/corporate-social-responsibility/sustainability>