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Ireland**  
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## **Chambers Ireland submission to Fingal County Council on Dublin Airport's North Runway**

February 2021

Chambers Ireland is the State's largest business representative network. We are an all-island organisation with a unique geographical reach; our members are the Chambers of commerce in the cities and towns throughout the country – active in every constituency. Given the importance of local economies to our members, and member businesses, Chambers Ireland's perspective is unique within the Irish business community – we seek to support thriving local economies and recognise the diversity of business environments that exist across the cities and regions of the country.

The successful development of the North Runway at Dublin Airport is of critical economic importance to ensure continued economic growth for the region and the island. At the heart of this is the increased international connectivity that this project will bring.

Therefore, Chambers Ireland and our members are deeply interested and engaged with the success of the North Runway. Drafted in correspondence with our Chamber Network and associated policy fora, we are pleased to have the opportunity to make this submission to Fingal County Council.

## Introduction

Dublin Airport is a critical piece of national infrastructure. In 2020, while its primary activity of passenger travel was greatly reduced due to the COVID-19 pandemic, its national importance in terms of connectivity was emphasised through its critical role in maintaining trade links and supplying our health services with PPE in particular.

The business community has been damaged by the twin impacts of Covid-19 and Brexit. These crises will continue to harm our economy into the coming years. As a result, Dublin Airport's role in connecting Ireland to the world will be even more important as we try to stimulate growth in our domestic economy, by diversifying our trading partners and supply chains. The new connections that the North Runway will make possible will be key to creating new opportunities for Irish businesses in this regard. These opportunities will be even more important given the kind of Brexit agreement that has been agreed to, and the challenges that it presents when supply from, and selling to, Britain.

As a long-term and nationally central infrastructure business, Dublin Airport must be able to continue to deliver what is required to maintain and develop Ireland's connectivity in times of low demand, whilst ensuring it has the appropriate infrastructure and operating environment to both promote and accommodate higher volumes of traffic that support tourism, trade and the broader economy.

The following sections of this submission outline Chambers Ireland's support of Dublin Airport Authority's (daa) proposal to amend the onerous planning conditions 3(d) and 5 of the original 2007 planning permission attached to the operation of the airport's new North Runway so as to enable the airport to continue to act as a sustainable economic driver of growth into the future, taking into account the needs of all local stakeholders. The key issues for consideration that the submission outlines include:

- **Connectivity** – As a small, open economy, Ireland is crucially dependent on its air links to facilitate business and trading. Direct connections are essential for both expanding Irish export trade and growing foreign direct investment in Ireland.
- **Competitiveness** – Early morning and late evening arrivals and departures are essential for many Irish business operations given that Ireland's time difference is one

hour behind continental Europe. Without these offerings businesses will likely see an increase in costs, especially on short-haul flights, and be at a competitive disadvantage to their European and British counterparts.

- **Rebuilding the economy post-Covid-19** – the North Runway will play a crucial role in helping to restore economic performance post-pandemic, contributing an estimated €261 million boost to the end of 2025 supporting 3,400 jobs.
- **Environmental safeguarding** – the proposed noise quota system at Dublin Airport would accelerate the shift by airlines to use more noise and fuel efficient aircrafts in the future, thereby reducing carbon emissions and the overall impact on the environment which will be critical in Ireland achieving its 2030 reduction targets.

## Background

Planning permission for the Dublin Airport North Runway was granted in 2007 when aircraft noise and aviation regulations were very different. Aircraft have since become significantly quieter and the ways of measuring and mitigating noise have also changed considerably.

Conditions 3(d) and 5 of the original 2007 grant of planning permission for the North Runway are scheduled to take effect airport-wide when the new runway becomes operational and are particularly problematic for the successful operation of the North Runway.

**Condition 3(d):** Prohibits the use of the new North Runway for landings and take-offs between the hours of 23.00 and 07.00.

**Condition 5:** States that, on completion of construction of the new runway, the average number of night-time aircraft movements at the airport shall not exceed 65 per night (between 23.00 and 07.00)

These conditions will have a profound impact on the operation of Dublin Airport and will undermine the vital role that the North Runway can play in Ireland's recovery and future economic prospects. That economic driver role has never been more important as we seek to overcome the compounding challenges of Covid-19 and Brexit.

## Daa's proposed amendments<sup>1</sup>

The following two amendments to the initial planning permission to balance the local and national interests should be strongly considered by Fingal County Council so as to avoid adverse effects on the operation of the entire airport, its key airline customers and stakeholders and the wider Irish economy:

1. Amending the hours of operation of the North Runway to allow for **use in the night-time shoulder hours** of 11pm to midnight and 6am to 7am
2. Replacing a night-time aircraft movement cap with a more appropriate **noise quota system**, which encourages the use of quieter aircraft.

These proposals would be complemented by further noise mitigation measures and enhanced monitoring frameworks, additional to those already required by daa's 2007 grant of planning permission:

- **A new night noise insulation grant** – a grant scheme for dwellings deemed to be exposed to night-time noise levels in excess of a set threshold. In addition to Dublin Airport's existing insulation programmes,<sup>2</sup> daa are proposing a night-time insulation grant scheme of €20,000 per eligible dwelling within specific boundaries. It is expected that up to 350 additional dwellings could benefit from this proposal.<sup>3</sup>
- **Introduction of an enhanced noise monitoring framework** at Dublin Airport to monitor, assess and report across a number of key noise metrics and to demonstrate ongoing compliance with a Noise Abatement Objective (NAO) that will be set by the Competent Authority.<sup>4</sup>

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<sup>1</sup> Daa's full proposal can be viewed at:

[https://northrunway.exhibition.app/resources/assets/pdf/NORTH\\_RUNWAY\\_SECTION\\_3.pdf](https://northrunway.exhibition.app/resources/assets/pdf/NORTH_RUNWAY_SECTION_3.pdf)

<sup>2</sup> Daa already operates a home insulation scheme for dwellings most impacted by current operations at Dublin Airport called the Home Sound Insulation Programme. A review of the eligibility of homes for inclusion within the scheme was undertaken in 2020.

Aircraft Noise Competent Authority (2020), *Aircraft Noise Mitigation at Dublin Airport*, Fingal County Council. Available at: [https://www.fingal.ie/sites/default/files/2020-08/an\\_overview\\_of\\_aircraft\\_noise\\_mitigation\\_at\\_dublin\\_airport\\_2020.pdf](https://www.fingal.ie/sites/default/files/2020-08/an_overview_of_aircraft_noise_mitigation_at_dublin_airport_2020.pdf)

<sup>3</sup> Daa, *Operation, Assessment and Next Steps*. Available at:

[https://northrunway.exhibition.app/resources/assets/pdf/NORTH\\_RUNWAY\\_SECTION\\_3.pdf](https://northrunway.exhibition.app/resources/assets/pdf/NORTH_RUNWAY_SECTION_3.pdf)

<sup>4</sup> A more in-depth explanation of how daa have used Lden and Lnight metrics to model baseline and future noise contours can be found here: [https://northrunway.exhibition.app/resources/assets/pdf/NORTH\\_RUNWAY\\_SECTION\\_3.pdf](https://northrunway.exhibition.app/resources/assets/pdf/NORTH_RUNWAY_SECTION_3.pdf)

Without hampering the overall operation of the airport, in addition to reducing any potential negative impact on the wider business community, these proposals are practical amendments which provide the operational flexibility to grow, whilst ensuring the overall effects of night-time operations at Dublin Airport are less than those originally envisaged by the original grant of planning permission in 2007 and do not exceed those subsequently envisaged the 2018 review. In light of this, Chambers Ireland wishes to highlight its support of these amendments.

## ***Key areas for consideration***

### **Connectivity**

Connectivity is essential in the international marketplace and it is fundamentally about access to markets and destinations. A country or region that has continental and intercontinental linkages to only a limited number of destinations will be a less desirable place to do business. Travel costs for staff and for goods will be higher due to the need to purchase multiple flight legs to move people and goods. On the other hand, a community with direct access to a broad range of markets, especially the fastest growing markets, will be a lower cost place to do business. It will also enhance customer servicing and goods and support staff can easily and quickly get to a range of destinations.

As a small, open economy, Ireland is crucially dependent on its air links to facilitate business and trading. Air access is critical for Ireland's economic development.<sup>5</sup> An InterVISTAS report in 2019 found that Dublin Airport's connectivity grew by 59% in the last five years, making it the second fastest growing major airport in Europe.<sup>6</sup> This has important implications for the wider economy of Ireland as the value of exports with well-connected countries is typically five to six times that of trade with poorly connected countries. While it should be noted that while air connectivity alone cannot create trade, it is a necessary requirement for trade

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<sup>5</sup> Dublin Airport brought goods worth €900 million from nearly 2,000 Irish suppliers from 2015 to April 2019. (Data supplied by daa).

<sup>6</sup> InterVISTAS (2019), *Dublin Airport Economic Impact Study 2019*. Available at: [https://www.dublinairport.com/docs/default-source/2016-economic-impact-assessment/economic-impact-report\\_2019.pdf?sfvrsn=6e7767da\\_6](https://www.dublinairport.com/docs/default-source/2016-economic-impact-assessment/economic-impact-report_2019.pdf?sfvrsn=6e7767da_6)

development. Poor air connectivity to a country will hinder the ability to develop business contracts, service clients and to compete with businesses in better connected countries.

Dublin Airport's pre-eminent position in the Irish aviation sector delivers the critical mass required to attract the necessary services to key short and long-haul destinations for both business and leisure markets. Direct connections are essential for both expanding Irish export trade and growing foreign direct investment in Ireland. Achieving higher connectivity will require the efforts of all airport stakeholders and will be dependent on supportive and expansive aviation policy, regulation and planning regimes to enable Dublin Airport to expand its facilities to meet demand. The North Runway will have a significant positive impact on this and the pay-off will be expanded air connectivity facilitating increased trade, tourism and investment.

## **Competitiveness**

Early morning flights between 6am-8am are already the most popular slots of the day in Dublin Airport, which is particularly important for the airport's based airlines. The advantages of having flexible operations during this peak morning flight window is essential for the economy given that Ireland's time difference is one hour behind continental Europe. The proposed planning conditions by Fingal County Council will see a reduction in the capacity of the airport in the critical 6am - 8am period which will increase costs for customers and businesses, especially on short-haul flights, and place Irish businesses at a competitive disadvantage to our European and British counterparts.

These conditions would also reduce the potential for same day returns with businesses losing the benefit of not being able to return employees back to Ireland in the same day that they travelled to another European city. This will reduce the number of business travellers considerably, while substantially 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 reduced into the medium-term. Creating extra hurdles to make it less attractive for business travel would damage the airport further.

Additionally, 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.<sup>7</sup> Whereas the 10pm-12am slot has previously enabled the airport's based carriers to return to Dublin in order to operate the next day. As a result, airlines may be forced to base aircraft in other countries, meaning that Irish travellers would likely see a reduction in the number of flight connections along many routes which will negatively impact on trade and business opportunities. It is likely that the effective operation hours of the airport would also be considerably shortened, having negative consequences for the businesses that operate within the airport, overall employment and the knock-on business that these hours afford to other businesses (such as transport).

However, daa's proposed introduction of a noise quota system at night is an industry standard approach for managing aircraft noise at night at many large international airports. If adopted, this noise quota system will operate between 11.30pm and 6am and will encourage the use of quieter aircraft in that period of the night, reducing the disruption to neighbouring communities and also reducing the need to avoid red-eye flights. Chambers Ireland is supportive of this proposal as it will ensure the overall effects of night noise at Dublin Airport are less than envisaged under the planning permission granted in 2007, and will not exceed those levels observed in 2018.<sup>8</sup> This would avoid a reduction in the capacity of both morning and evening flight slots and safeguard the established connections that Dublin Airport and airlines have to both European and international destinations, ultimately protecting Irish business competitiveness on the continent and in North America.

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<sup>7</sup> Pre-Covid-19, the airport facilitated over 100 flights during the hours of 11pm and 7am.

<sup>8</sup> Daa, *Operation, Assessment and Next Steps*. Available at:  
[https://northrunway.exhibition.app/resources/assets/pdf/NORTH\\_RUNWAY\\_SECTION\\_3.pdf](https://northrunway.exhibition.app/resources/assets/pdf/NORTH_RUNWAY_SECTION_3.pdf)



## Rebuilding the economy post-Covid-19

At the beginning of January 2020, a study conducted by InterVISTAS on Dublin Airport's overall economic impact found that, combining its direct, indirect, induced and catalytic impacts, it contributes €9.8 billion in Gross Value Added to the Irish economy (representing 3.1% of the national economy based on CSO estimates of 2018 GDP) and supports or facilitates almost 130,000 jobs.<sup>9</sup>

It is estimated that if the planning restrictions are not removed there will be a cumulative loss of 4.3 million passengers for Dublin Airport between 2022 and 2025.<sup>10</sup> It has also been calculated that the economy will lose out on a €261 million boost to the end of 2025 if the runway restrictions are not removed. In terms of job losses, it is believed that the economy could forego an additional 3,430 jobs.<sup>11</sup>

Failure to address the two restrictive conditions will have direct and long-lasting impacts, especially as we look to rebuilding the economy post-pandemic. In addition to the aforementioned, it is likely that other adverse impacts will include:

- A 43% reduction in current capacity between 11pm and 7am
- Disruption to time-critical air cargo operations and long-haul connectivity
- Less routes, less competition and higher fares
- Reduced potential for expansion of air services to new and existing global markets
- Reduced connections to mainland Europe at peak hours, that:
  - i. enable airlines to complete a sufficient number of round trips per day to remain competitive; to locate aircraft here; to develop and maintain routes to and from Ireland; and to support our island economy at a critical time
  - ii. help Ireland offset the one-hour time zone difference with continental Europe

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<sup>9</sup> This economic impact of Dublin Airport includes the direct impacts related to ongoing operations at Dublin Airport (including Daa, airlines, air traffic control, ground handlers, airport security, immigration, customs, airport retail, etc.), as well as indirect impacts in businesses that supply the goods and services to the direct activities linked to the airport, and induced impacts resulting from direct and indirect employees spending their wages in the general economy.

InterVISTAS (2019), *Dublin Airport Economic Impact Study 2019*.

<sup>10</sup> InterVISTAS (2019), *Dublin Airport Economic Impact Study 2019*.

<sup>11</sup> InterVISTAS (2019), *Dublin Airport Economic Impact Study 2019*.



- iii. enable short-haul passengers to complete a round trip in a single day, taking full advantage of normal working hours at their destination whilst avoiding the cost and time of an overnight stay.<sup>12</sup>

## Environmental safeguarding

As previously highlighted, Chambers Ireland is committed to championing the SDGs in all areas of our work. So too is Dublin Airport Authority who have implemented a Sustainability Strategy into its corporate strategy,<sup>13</sup> identifying it as being a critical enabler for future growth. In doing so, daa has identified 3 of the 17 SDGs as being most closely aligned with its activities covering areas such as ensuring access to affordable, reliable, sustainable and modern energy for all (Goal 7), building resilient infrastructure and promoting inclusive and sustainable industrialisation (Goal 9), and taking urgent action to combat climate change and its impacts (Goal 13). The Sustainability Strategy aims to deliver a range of measures including:

- Achieving carbon neutral status (Level 3+) under the Airport Carbon Accreditation (ACA) Scheme - the European Standard for carbon management and emissions reductions at airports
- Committing to a Net Zero Carbon target for operations by 2050 at the latest
- Implementing a Low Emission Vehicle policy
- Installing a range of energy efficient lighting and heating facilities across the Dublin Airport campus
- Increasing focus on energy-efficient design and implementation of construction projects.

Some examples of how the North Runway aims to tackle these issues in practice include the following:

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<sup>12</sup> All information provided by daa.

<sup>13</sup> Daa (2019), *Sustainability Report 2019: Taking Action for a Greener Airport*. Available at: <https://www.daa.ie/wp-content/uploads/2020/10/Dublin-Airport-Sustainability-Report-Final.pdf>

## **1. Reduction in paved areas and building materials**

The newly approved layout will result in a reduction of approximately 115,000 square meters of paved area, consequently reducing the amount of building materials used to construct the runway and taxiway system. The composition of the landscaped grass areas, which are required to enhance the navigational equipment, will also reduce the amount of spoil material sent off-site for disposal.<sup>14</sup>

## **2. Noise reduction and carbon emissions**

A restriction on the number of flight 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.

The proposed 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, thereby incentivising airlines to use quieter aircraft at Dublin Airport.

As a result, wider environmental safeguarding will also be ensured as airlines look to overhaul their fleets so that they are less costly and more sustainable. Studies have shown that more fuel efficient aircrafts and a reduction in aircraft noise go hand in hand while also reducing the overall impact on the environment.<sup>15</sup> With better fuel efficiency comes less carbon emissions. The proposed noise quota system at Dublin Airport, ranked the 11<sup>th</sup> largest airport

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<sup>14</sup> Dublin Airport (2020) *Planning Approval Secured to Amend Layout of North Runway*. Available at: <https://www.dublinairport.com/corporate/north-runway/latest-news/2020/03/30/planning-approval-secured-to-amend-layout-of-north-runway>

<sup>15</sup> United Technologies (2021), *The next generation of eco-friendly airplanes has just arrived...quietly*, The Washington Post. Available at: <https://www.washingtonpost.com/sf/brand-connect/wp/enterprise/the-next-generation-of-eco-friendly-airplanes-has-arrivedquietly/>

Maha Mousavi Sameh & Juliana Scavuzzi (2016), *Environmental Sustainability Measures for Airports*. Centre for Research in Air and Space Law. Available at:

[https://www.mcgill.ca/iasl/files/iasl/vii\\_sustainability\\_and\\_environmental\\_protection\\_measures\\_for\\_airports\\_final.pdf](https://www.mcgill.ca/iasl/files/iasl/vii_sustainability_and_environmental_protection_measures_for_airports_final.pdf)

in the EU,<sup>16</sup> would undoubtedly accelerate this shift to more noise and fuel efficient aircrafts in the future.<sup>17</sup>

It should also be noted that as the Aircraft Noise Competent Authority (ANCA), under the Aircraft Noise (Dublin Airport) Regulation Act 2019, Fingal County Council must monitor compliance with noise mitigating measures and operating restrictions at Dublin Airport, ensuring that noise generated by aircraft activity at Dublin Airport is assessed in accordance with EU and Irish legislation.<sup>18</sup> Where a noise problem or potential noise problem at the airport is identified, ANCA must ensure that the ICAO Balanced Approach to aircraft noise management is adopted.<sup>19</sup> Where there is a noise abatement objective in place at the Airport, the ANCA's remit is further extended to include a review of the effectiveness of the noise mitigation measures and operating restrictions (if any) on achieving the noise abatement objective. Notably, the authority must exhaust all of the following three options before flight restrictions can be considered:

1. Reducing the source of the noise, including the aircraft itself;
2. Land-use planning and management; and
3. Procedures to reduce noise.<sup>20</sup>

Therefore, ANCA is legally bound under the Aircraft Noise (Dublin Airport) Regulation Act 2019 to ensure that all of the above three options are carefully considered before a restriction on flights between specific hours of the day or night be enforced. We would ask that this be taken into account when reviewing the daa proposed amendments.

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<sup>16</sup> Figures based on 2018.

Dublin Airport (2019), *Dublin Airport was 11<sup>th</sup> largest airport in 2018*. Available at: <https://www.dublinairport.com/latest-news/2019/05/31/dublin-airport-was-eu-s-11th-largest-airport-in-2018>

<sup>17</sup> See footnote 4 for more information on this.

<sup>18</sup> Aircraft Noise Competent Authority (2020), *Aircraft Noise Mitigation at Dublin Airport*. Available at: [https://www.fingal.ie/sites/default/files/2020-08/an\\_overview\\_of\\_aircraft\\_noise\\_mitigation\\_at\\_dublin\\_airport\\_2020.pdf](https://www.fingal.ie/sites/default/files/2020-08/an_overview_of_aircraft_noise_mitigation_at_dublin_airport_2020.pdf)

<sup>19</sup> The Balanced Approach to aircraft noise management was developed by the International Civil Aviation Organisation (ICAO). It is an internationally agreed approach to managing noise at large airports. It consists of identifying whether a noise problem exists at an airport and then analysing the various measures available to reduce noise.

<sup>20</sup> Aircraft Noise Competent Authority (2020), *Aircraft Noise Mitigation at Dublin Airport*.

## Concluding remarks

As a long-term infrastructure business, Dublin Airport must continue to deliver what is required to maintain and develop Ireland's connectivity in times of low demand, whilst ensuring it has the appropriate infrastructure and operating environment to both promote and accommodate higher volumes of traffic that support tourism, trade and the broader economy. Once the public health crisis abates, the role played by Dublin Airport in maintaining the supply chain, enabling connectivity for tourism and trade and acting as an economic engine for the country will be crucial to national recovery efforts. The North Runway will be a key component in this regard if it is granted the operational flexibility to deliver its potential.

The delivery of North Runway is a key recommendation of the Government's National Aviation Policy, and both of its subsequent progress reports,<sup>21</sup> as it will significantly expand connectivity and flexibility at Dublin Airport and also enable it to continue to develop as a gateway between Europe and North America. Therefore, Chambers Ireland recommend that Fingal County Council reconsider Conditions 3(d) and 5 of the original 2007 grant of planning permission for the North Runway in light of the reasons previously outlined in this submission. The two amendments proposed by the daa to the initial planning permission – to amend the hours of operation to allow for use between 11pm-12am and 6am-7am, along with replacing a night-time aircraft movement cap with a more appropriate noise quota system – represent a fair balance between both the commercial and economic benefits and appropriate recognition of the needs of local communities and national interests, all underpinned by a commitment to sustainability. We would ask that these be strongly considered by Fingal County Council so as to avoid adverse effects on the operation of the entire airport, its key airline stakeholders and the wider Irish economy.

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<sup>21</sup> "The project to develop the second parallel runway at Dublin Airport is a key factor in providing the long-term capacity requirements to facilitate its further development as a secondary hub". Department of Transport, Tourism and Sport (2019), *The National Aviation Policy: Second Progress Report*. Available at: <https://assets.gov.ie/14236/984e67e8dcb7406b9b6a20305fffe131.pdf>