

Fingal Chamber Observation to An Bord Pleanála Regarding Draft Decision Issued on 17th September 2024 Regarding North Runway Operating Restrictions (Reg. Ref. PL06F.314485)

Introduction

Fingal Chamber is the accredited Chamber for the entire Fingal region representing over 500 businesses that support 50,000 jobs in the area.

Fingal Chamber is the independent voice of business in Fingal, with members across every town from Balbriggan in the north to Santry in the south, and from Howth in the east to Blanchardstown in the west. The Chamber advocates for business, provides advice, support, referrals, lobbying and represents members to deliver positive change and drive a strong vision for Fingal as the best place for business.

The Chamber also works with Government Ministers, MEPs, the Mayor of Fingal, Fingal County Council and local representatives to deliver pro-business and employment initiatives for the region.

Fingal has major economic assets which includes Dublin Airport and strong representation from the pharmaceutical, agri-food, IT, retail and extended aviation industry.

Fingal Chamber is deeply concerned regarding the draft decision issued by An Bord Pleanála (ABP) on 17th September 2024 concerning the operating restrictions for the North Runway at Dublin Airport. The proposed conditions, particularly those related to night-time aircraft movements and operating restrictions, will have severe consequences for Dublin Airport's operations, Ireland's economic reputation, and the broader aviation ecosystem. This submission highlights key concerns with the draft decision and respectfully urges ABP to re-examine its findings and proposed conditions to ensure compliance with statutory obligations and international best practices.

The development of a parallel runway system at Dublin Airport has been a strategic objective to strengthen Ireland's global connectivity since the 1960s. The construction of the North Runway, completed in August 2022 at a cost of €320 million, was a critical infrastructure investment aimed at supporting Ireland's growing aviation needs.

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Key Concerns with the Draft Decision

1. Operational Constraints on Peak Traffic Windows

The North Runway is a critical piece of infrastructure designed to address Dublin Airport's capacity constraints. Operational flexibility is particularly vital during the 6:00 am–7:00 am peak window for early departures and the 11:00 pm–12:00 am period for late arrivals.

As Ireland operates one hour behind continental Europe, early morning departures are essential to connect Irish passengers to European hubs and onward destinations. Similarly, late evening arrivals enable home carriers like Aer Lingus and Ryanair to position aircraft for the first wave of departures the following morning. Restricting these critical operational periods will severely disrupt connectivity and Ireland's competitiveness.

2. Condition 3(e): Impractical Restrictions on Runway Use

Condition 3(e) would prohibit arrivals or departures on the North Runway during easterly winds between 6:00 am and 8:00 am, forcing all operations onto the South Runway. This restriction introduces unnecessary inefficiencies and risks significant delays, especially during peak hours.

3. Condition 5: Drastic Reductions in Night-time Movements

The draft decision proposes a limit of 13,000 annual night-time air traffic movements (ATMs), equating to an average of 35 movements per night. This represents a 60% reduction compared to the 2007 planning condition of 65 night-time movements.

This extreme reduction would significantly impact airlines, passengers, and freight operations, undermining the viability of Dublin Airport as a 24/7 international hub and Ireland's competitiveness. Seasonal variations and calculation errors in deriving these limits further compound the issue.

4. Economic Impact of the Proposed Restrictions

According to a 2021 study by InterVISTAS, Ireland could forgo thousands of jobs and hundreds of millions of euros in GDP annually if the North Runway is not fully utilised. This economic impact extends beyond aviation to sectors such as tourism, trade, and investment.

Dublin Airport supports over 100,000 jobs and contributes billions of euros to the Irish economy. The proposed restrictions will erode this value, damaging Ireland's reputation as an open and accessible economy.

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5. Non-compliance with Statutory and Regulatory Frameworks

Section 9.7 of the Aircraft Noise (Dublin Airport) Regulation Act 2019 states that noise mitigation measures “shall not be more restrictive than is necessary” to achieve the Noise Abatement Objective (NAO). The draft decision fails to establish whether the proposed restrictions are required to meet the NAO and does not properly consider the Balanced Approach mandated under EU Regulation 598/2014.

The introduction of additional restrictions, such as Condition 3(e) and the night-time ATM limit in Condition 5, lacks a clear justification under the Balanced Approach framework.

Call to Action

In light of these concerns, Fingal Chamber respectfully requests that An Bord Pleanála:

1. Re-examine the draft decision and ensure adherence to the statutory process outlined in the 2000 Act (as amended by the 2019 Act).
2. Remove the proposed restrictions outlined in Condition 3(e) and Condition 5, as they are neither justified nor required to achieve the NAO.
3. Apply the Balanced Approach to identify noise mitigation measures that strike a proportionate balance between operational needs and noise management.
4. Prioritise the economic and operational benefits of utilising the North Runway fully, ensuring Dublin Airport remains a competitive and efficient international gateway.

Conclusion

The current draft decision represents a significant step backward in Dublin Airport’s ability to support Ireland’s economic growth and connectivity. The proposed conditions will have profound operational, economic, and reputational consequences, undermining decades of strategic investment in aviation infrastructure.

On behalf of Fingal Chamber members, I urge An Bord Pleanála to reconsider its draft decision and support a balanced and pragmatic approach to managing airport operations and noise mitigation.

Thank you for considering this.

Yours sincerely,

Anthony Cooney

Anthony Cooney

Chief Executive Officer

Fingal Chamber

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