

Ms. Ethna Felten
Director
Aircraft Noise Competent Authority
Fingal County Council, County Hall
Main Street
Swords, Co. Dublin, K67X8Y2.

11 January 2022

Relevant Action Planning application F20A/0668 – Dublin Airport North Runway.

Dear Ms. Felten,

Ibec's Transport & Infrastructure Council welcomes this opportunity to comment on the Authority's Draft Regulatory Decision published on 11 November. Ibec is Ireland's largest business representation organization with thousands of member companies throughout the country, including the Fingal area. We work with government and policymakers locally, nationally, and internationally to shape business conditions and drive economic growth.

Ibec agrees with the assessment of the Eastern and Midlands Regional Authority's *Regional Spatial and Economic Strategy*, namely that Dublin Airport is a key national asset to Ireland's economic success, linked with its global connectivity to trade and tourism markets. For this reason, Ibec and its members have, for some considerable time, been deeply concerned about the significant adverse economic implications of certain conditions attaching to the 2007 consent decision by An Bord Pleanála in respect of the North Runway development.

Specifically, the effect of Conditions 3(d) and 5 would be to place severe constraints on early morning business departures, as well as on existing overnight airfreight and passenger traffic. Given the length of time that has elapsed since the consent was granted and the growth in the economy during this period, Ibec believes these restrictions are no longer fit for purpose. By specifying a static numerical limit on nighttime flights, they fail to take proper account of the dynamic nature of technological improvements in aircraft noise performance under the Standards and Recommended Practices of the Convention on International Civil Aviation. Our 2017 submission to the Government's *National Planning Framework* consultation therefore argued that national and regional policy should provide guidance to the relevant planning authorities on the need for consistency with the ICAO Balanced Approach.

Having reviewed the draft Regulatory Decision, and the associated Noise Abatement Objective (NAO) consultation document, Ibec considers that the Authority's decision to replace the numerical cap on nighttime flights with a Noise Quota system is well reasoned, evidence-based, and correct. Although the proposal covers a somewhat longer nighttime period than that applied in other major European airports, the annual Quota appears to be adequate for the needs of the airport's users as the economy emerges from Covid-related travel restrictions.

The proposed limitation on the Quota Count of individual flights between midnight and 6.00am arguably goes beyond the ICAO Chapter 14 noise standard, but it is in line with best international practice. Furthermore, the provision of insulation grants for impacted properties should be of immediate benefit to local communities that may be adversely affected by the change in runway operation.

Being underpinned by an independent Strategic Environmental Assessment and an Appropriate Assessment, the Regulatory Decision should enable the continued development of Dublin Airport as a regional hub, while protecting the local environment. Ibec considers that the NAO targets for progressive reductions in the number of people suffering sleep disturbance due to aircraft noise are ambitious, but that they will provide strong incentives for airlines to introduce quieter, more fuel-efficient aircraft.

I would be happy to provide clarification to ANCA or to Fingal County Council on any of the foregoing points if required.

Yours sincerely

Neil Walker

Dr Neil Walker

Head of Infrastructure, Energy and Environment