



**Fingal Dublin  
CHAMBER**  
IN BUSINESS FOR BUSINESS

**Commission for Aviation Regulation  
3<sup>rd</sup> Floor, Alexandra House,  
Earlsfort Terrace,  
Dublin 2**

**31<sup>st</sup> July 2014**

## **Response to Airports Draft Decision Paper**

### **Introduction**

Fingal Dublin Chamber of Commerce is the accredited Chamber of Commerce for the Fingal Region of Dublin which is home to Dublin Airport. As the area's largest and most representative business organisation, the Chamber promotes the creation and maintenance of a vital, thriving business climate and supports the civic, educational, recreational and economic well-being of the Fingal Region.

The Fingal Region is home to over 270.000 people and has the fastest growing and the youngest population in the country. The area is renowned for strong business leadership and inspiring innovation in technology, manufacturing, aviation, financial services, logistics & distribution, quality of food and tourism & hospitality. It is also home to some of the best and most outstanding multi-national companies from across the world who have chosen this region to invest in and to create jobs for the well-educated and highly-skilled workforce. This is in addition to the large diversified range of indigenous companies who provide services to businesses and consumers.

Dublin Airport is and has been for many years a major provider of a wide range of high quality jobs for large numbers of people in Fingal and the Dublin City Region which is why the Chamber believes that the future growth of Dublin Airport is important for the continued economic development of Fingal, the Greater Dublin Region and the country as a whole.

Having Dublin Airport in the Region has been one of the major factors in the economic success of the area and the Dublin City Region now is benchmarked and competes with other city regions with international airports. The airport provides the main international access not only to Dublin but to the entire country and it works hard to attract more business and leisure visitors to Ireland.

DAA has been innovative in attracting new routes and airlines to the airport whilst growing the volume and frequencies on existing routes and it is vital that this continues to support the Governments economic development strategy to create more jobs for our growing population.

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## **Future Development of Dublin Airport**

The Chamber is concerned that the future development of Dublin Airport and its ability to meet increased demands is being overly restricted by this determination.

The Airport must be allowed to grow in a planned and well-resourced manner to take account of the needs of the travelling public and the aviation industry. All actions must put the customer at the heart of air transport providing a safe, secure and environmentally acceptable experience.

We believe it is the responsibility of CAR to implement a determination that allows this to happen.

### **Terminal 1**

Terminal 1 is in need of a major overhaul and re-development. The passenger experience is not as good as it should be and this must be addressed.

- A new master-plan should be drawn up to allow for the orderly re-development of Terminal 1 and its Piers.
- We must learn from the mistakes of the past and ensure that the appropriate infrastructure, facilities and services are delivered on time and to a high standard and in an efficient and cost effective manner.
- New security gates need to be developed to avoid passenger frustration and to further cut queuing times.
- With the growth planned and the increased number of airlines using T1 it will become “not fit for purpose” if the right steps are not taken. Early planning and execution is key to the future.

### **Terminal 2**

Terminal 2 has been an outstanding success with leisure passengers and business executives from across business sectors and in particular multi-national companies commenting on it as a great gateway to Ireland. The development of direct flights to the west coast of the US as well as other direct Trans-Atlantic flights have come about as a direct result of this new terminal. The continued expansion of flights to the Middle East is also down to the excellent facilities in T2.

- DAA must be allowed to continuously upgrade and maintain this facility to the highest standards.
- Improved Transfer Facilities at T2 should be provided to allow for Dublin Airport to develop the airport as a secondary hub for air travellers in the UK and Europe. This is recognised as an important future business growth area for the airport by the Draft Aviation Policy for Ireland.

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## **North Runway**

The construction of the new north parallel runway is crucial for the future development of Dublin Airport.

- The current planning permission for the North Runway is now outdated and must be renewed as a matter of some urgency. This process could take 2–3 years and even if started in 2015 would not be in place until 2018.
- Given the current state of the property market it would be wise to allow for the runway related “House buy-out” to be completed. Dublin Airport has always purchased and reserved the necessary land for future development and this has proved a very prudent policy over many decades.

*The costs of these two elements of the North Runway project, is just over 2% of the total estimated cost of the entire project and should not be part of the triggering mechanism. The decision on the timing of carrying out these actions should be left to management.*

- The triggering mechanism for construction of the runway itself is, we believe flawed in that even with the planning process starting in 2015, construction could not start before 2018-2019. This means that the new runway could not be operational until 2021-2022 at the earliest. This is simply not good planning. It is widely recognised that modern airports handling high volumes of local, regional and international flights are best served by parallel runways which gives the optimum flexibility for handling small, medium and large aircraft. The longer runway will also be required to handle fully loaded wide-bodied aircraft which are becoming more popular for long distance travel.
- The reason put forward for increasing the number of passengers from 23.5m to 25m as a triggering mechanism for the start of the new runway is not convincing. The capacity of 10/28 is stretched at peak times and this will only get worse. The new parallel longer runway would relieve this pressure and allow for more efficient movements during peak times.
- Whilst accepting the method of calculating passenger numbers over the years 2014-2019, there would appear to be evidence of continued increased growth in the numbers each year which could make the formula redundant. In 2013 there was a growth of approximately 5.5% and the percentage for 2014 is similar if not higher based on the most recent figures.
- Increased flight movements should also be taken into consideration when assessing the need for the new runway.
- The new longer runway would also allow DAA to pursue the larger more modern and more environmentally efficient aircraft to fly into Dublin Airport thus reducing the number of small aircraft to deliver the same number of people.

## **Alignment of the Determination with Government & EU Policy**

There would appear to be no clear alignment of this determination with planned Government and EU Policies under a number of headings. The additional costs of implementing costly regulatory required expenditure must be clearly put in place to ensure that Dublin Airport is in compliance at all times.

- There appears to be little consideration to the Government’s Draft Aviation Policy in the Determination.
- It would also appear that the implications of the Government’s Green Paper on Energy has not been given much consideration.
- The headlines of the new EU Policy on Energy which will be announced in October does not appear to have been taken into account in this Determination

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## **Dublin Airport – A Key Driver of Economic Development for Ireland**

Dublin Airport is a key driver of economic development in Ireland and this must be encouraged and supported in the years ahead while we attempt to re-build our economy. The airport is also essential for our tourism industry, for our business community and for connecting Ireland with the rest of the world.

- Dublin Airport provides over 14,000 jobs directly and it is estimated that for every direct job there are three times as many employed indirectly in service companies. This would suggest that over 60,000 people are employed directly and indirectly by Dublin Airport.
- It is also generally accepted that for every additional million passengers using the airport 750 direct jobs are created. Projecting this out over the course of this determination another 3,000-4,500 direct jobs will be created with a corresponding 10,000 indirect jobs.
- Dublin Airport allows exporting companies to get their high value products to market in an efficient and cost effective way which further enhances Ireland as a major global exporter of goods.
- The Government has stated very clearly that every aspect of policy must be aligned to economic development and the creation of jobs.

### **Conclusion**

We are an island state and Dublin Airport has a key role to play in the economic recovery of Ireland by providing the connectivity for people and business to flow in and out of the country. The airport has also a major part to play in bringing much needed tourists to Ireland from around the world.

CAR must ensure that the airport has the necessary resources to grow airline traffic and passenger numbers in the years ahead to support the economic recovery of the country.

We believe that the Draft Determination has significant flaws which require changes in order to ensure the proper planning and development of Dublin Airport over the years 2014-2019 and beyond.

Yours sincerely



**Tony Lambert**

**Chief Executive**



**Siobhan Kinsella**

**President**

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