

Mr. William Prasifka,
Commissioner,
Commission for Aviation Regulation,
36 Upper Mount Street,
Dublin 2.

20th July 2001.

**Re: Proposed Maximum Levels of Airport Charges,
Draft Determination and Explanatory Memorandum,
Commission Paper CP6/2001, 26 June 2001.**

Dear Mr. Prasifka,

Fingal County Council welcomes this opportunity of contributing to the consultation phase of the Commission for Aviation Regulation's review of Airport Charges and wishes to offer its co-operation in expanding the discussion of any of the issues raised.

Fingal County Council and Dublin Airport

Fingal County Council as the local authority for the area has a unique role in facilitating the development potential of Dublin Airport and its environs and acting as the guardian of this national resource. Dublin Airport is of international and national importance and represents the most significant single economic entity in Fingal and in the Dublin region. The Airport has a unique contribution to make to the economy both nationally and regionally and to the County, particularly due to its large employment base, major passenger throughput and ready access to airfreight facilities.

The Council over the last two years has actively sought to enhance its role as the planning authority for the airport and its environs by participation in the recently completed NWMA Interreg Project COFAR (Common Options for Airport Regions), membership of the Airport Regions Conference (ARC) and the currently ongoing South Fingal Planning Study.

With regard to the South Fingal Planning Study, the Council has appointed an international team of consultants to carry out a comprehensive planning study of the South Fingal area, including Dublin Airport and its environs. The aim of the study is to ensure that the potential of South Fingal is harnessed effectively in the interests of the long-term development of the area.

Response to Commission Paper CP6/2001,

Due to the importance of Dublin Airport as a spatial, social and economic asset for Fingal County, the Council wishes to raise the following issues concerning the document produced by the Commission for Aviation Regulation.

- In relation to *the contribution of the airport to the region in which it is located* the document states that:
“In order to have due regard to Section 33(d) it has been necessary for the Commission to assess the current contribution of the airports to the regions in which they are located. As a preliminary remark, the Commission notes that this factor is concerned with the regional contribution, not of one or two of the Aer Rianta airports, but rather with all three. The Commission has been greatly assisted in its assessment of the contribution of the airports to the regions in which they are located by the submissions of interested parties.” (pages 11 and 12).

The definition and interpretation of regions which the Commission for Aviation Regulation has used is unclear. Regional and local authorities aim for environmental, social and economic integration of an airport into the surrounding region and communities. The impact of development and operations within the airport platform goes beyond the airport boundary and beyond aspects of safety and operation of airports. Thus the impacts of changes of charges within the airport have a knock on effect on the communities and the infrastructure of larger spatial areas which statutory bodies such as Fingal County Council represent.

- Airports are not only gateways to the world, but also major factors in the development of their region. Dublin Airport is an international airport and is the gateway to Ireland, Dublin and Fingal from many countries. The results from the COFAR studies suggest that the forecasted growth in passengers, cargo and aircraft movements can be accommodated at current locations without increase in noise nuisance if airports and airlines are sufficiently motivated to invest in new technology and practices. The proposed reduction in the Aer Rianta CAPEX Programme in Dublin Airport should be re-examined in respect to its impact on Fingal and the Dublin region. This would also be true for Cork and Shannon Airports.
- It is observed that the benchmarking exercise undertaken in Annex V uses cost efficiency parameters. Sustainability issues with respect to airports are an important challenge to airport operators in the new millenium. The quality of the environment both within and surrounding the airport for users, hosting regions and communities should also be an important benchmarking parameter which needs to be examined and analysed in respect of charges for airport users.

Conclusion

Fingal County Council is grateful for the opportunity to participate in the consultation phase of the review of airport charges.

The work that Fingal County Council has undertaken on airports in partnership with our European colleagues has clearly shown that the impact of an airport does not end at the perimeter of the complex. Changes to legislation, reviews of charges and technology have impacts, which are not always foreseen, on larger spatial areas and the communities within them. These impacts are the principal concern of Fingal County Council.

I attach the COFAR public document for your information and also would suggest consultation of the project's website, www.cofar.org .

Yours sincerely,

Mark Walsh,
Deputy County Manager &
Director of Services, Planning & Development.

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